

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

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In re :
: MUR 4378 :
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: :
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Washington, D.C.

Friday, November 7, 1997

Deposition of

JO ANNE B. BARNHART

a witness, called for examination by counsel
for the Federal Election Commission (FEC)
pursuant to notice and agreement of counsel,
beginning at approximately 10:45 a.m. at the
FEC offices, 999 E Street, N.W., Washington,
D.C., before Sharon McKinnon, Certified
Shorthand Reporter and notary public in and for
the District of Columbia, when were present on
behalf of the respective parties:

BETA

1 APPEARANCES:

2 On behalf of the FEC:

3 ANNE WEISSENBORN, ESQUIRE
4 MARY ANNE BUMGARNER, ESQUIRE
5 Office of General Counsel
6 Federal Election Commission
7 999 E Street, N.W., Room 657
8 Washington, D.C. 20463
9 (202) 219-3690

10 On behalf of the National Republican
11 Senatorial Committee (NRSC):

12 BOBBY R. BURCHFIELD, ESQUIRE
13 MICHAEL A. DAWSON, ESQUIRE
14 Covington & Burling
15 1201 Pennsylvania Avenue, N.W., 11th Floor
16 Washington, D.C. 20044
17 (202) 662-5465

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P R O C E E D I N G S

Whereupon,

JO ANNE B. BARNHART

was called as a witness and, having been first
duly sworn, was examined and testified as
follows:

EXAMINATION BY FEC COUNSEL

BY MS. WEISSENBORN:

Q Would you give your full name?

A Jo Anne Bryant Barnhart.

Q I'm Anne Weissenborn. I'm here with
Mary Anne Bumgarner, representing the Office of
General Counsel in this deposition.

Your deposition is being taken
pursuant to a subpoena issued by the Federal
Election Commission to the National Republican
Senatorial Committee in connection with an
investigation being undertaken pursuant to
2 USC, Section 437(g).

This is the enforcement matter of
which this investigation is a part has been
designated MUR 4378.

1 A moment ago you signed a
2 Confidentiality Advisement Statement, which I'm
3 going to show you again. We're going to have
4 it marked as an exhibit.

5 MS. WEISSENBERG: Exhibit No. 1,
6 please.

7 (Barnhart Deposition Exhibit
8 No. 1 was marked for
9 identification.)

10 BY MS. WEISSENBERG:

11 Q This is your signature?

12 A Yes, it is.

13 Q Is this your home address?

14 A Yes, it is.

15 Q 4609 South Eighth Street in
16 Arlington, Virginia, 22204?

17 A That's correct.

18 Q Your date of birth is

19 A Yes.

20 Q Okay. This document provides that
21 the confidentiality of this investigation must
22 be maintained, and that this will hold until

1 the commission has closed its files, and you
2 will be informed about that.

3 Have you ever been deposed before?

4 A No.

5 Q Let me just tell you a little bit
6 about how it works. I will be asking a series
7 of questions, which you're being asked to
8 answer under oath. If you don't understand a
9 question I ask, please feel free to stop me. I
10 can restate it again, or I can reword it.

11 If you should decide that an answer
12 you gave earlier was incomplete or inaccurate,
13 just let me know, and you can go back and
14 correct it or add to it. If you don't stop me
15 or request a chance to amend your answer, we'll
16 assume that the answer you gave has been
17 responsive to the question.

18 As you can tell, it's necessary to
19 say orally "yes" or "no." The reporter can't
20 rely upon head shakes.

21 A Right.

22 Q I'm going to do my best to avoid

1 repetitious questions because I don't want to
2 stay any longer than necessary as I know you
3 don't. But I will perhaps go a little bit back
4 and forth in time, and sometimes seem to be
5 repeating a question, but really, I'm not
6 trying to prolong anything beyond reason.

7 Are you represented by counsel today?

8 A Yes, I am.

9 Q Have you retained counsel personally?

10 A No, I have not.

11 Q How have they been retained for you?

12 A Through the NRSC.

13 Q Have you discussed this deposition
14 with anyone other than your attorney?

15 A No, I have not.

16 MR. BURCHFIELD: Just to be clear
17 about this line of questioning, this is an area
18 that you would not really expect a layman to
19 understand the fine points. This a subpoena.
20 She's appearing as a witness designated by the
21 NRSC pursuant to a deposition subpoena issued
22 to the NRSC.

1 So we are appearing as counsel for
2 the NRSC, and Ms. Barnhart in her capacity as
3 NRSC's designated representative.

4 BY MS. WEISSENBORN:

5 Q Have you brought any documents or
6 other materials with you?

7 A No, I haven't.

8 Q I would like to ask just a few
9 questions to get a little bit of your
10 background.

11 A Okay.

12 Q Are you a native of the Washington
13 area, or where do you come from?

14 A No, I was born in Memphis, Tennessee.

15 Q Where did you go to college?

16 A I went to college the first two years
17 at University of Tennessee. When I was 13 my
18 family moved to Delaware, so I went back to
19 Delaware. Tennessee for two years; Delaware
20 for two years and graduated from the University
21 of Delaware.

22 Q What is your present employment?

1 A I currently work for myself. I have
2 a consulting business that I started.

3 Q What's the name of that?

4 A Jo Anne B. Barnhart & Associates.

5 Q Do you have an office separate from
6 your home?

7 A I do.

8 Q What's the address of that?

9 A 3900 Fairfax Drive, Suite 301,
10 Arlington, Virginia 22203.

11 Q When did you begin your own business?

12 A After I left the Senatorial Committee
13 in January of this year.

14 Q January of '97?

15 A Yes.

16 Q Now, you say you went there from the
17 NRSC. What was your position with the NRSC,
18 the one that you left when you --

19 A I was the political director.

20 Q How long were you in that position?

21 A From February 13, 1995, until around
22 January 4, '97.

1 Q Was that the only position that you
2 held at the NRSC?

3 A Yes, it was.

4 Q You came in as the political
5 director; is that correct?

6 A Yes, that's correct.

7 Q I've read somewhere of the title
8 "political services director"; is that the same
9 thing?

10 A It is the same thing. It's called
11 the political services division. I was
12 political director for the political services
13 division.

14 Q Before you were with the NRSC, where
15 did you work?

16 A Most immediately I had run Senator
17 Bill Roth's re-election campaign in Delaware.

18 Q And then I believe you had worked for
19 him in his senatorial office; is that correct?

20 A Yes. I did work with a senior
21 adviser in his office too.

22 Q Are you married?

1 A Yes, I am.

2 Q What is your husband's name?

3 A David.

4 Q Barnhart?

5 A Yes, David Barnhart.

6 Q Prior to 1995, 1996 -- you partly
7 just answered this -- you had worked on other
8 federal campaigns; is that correct?

9 A That is correct.

10 Q Senator Roth's?

11 A Yes.

12 Q Any others?

13 A Well, I ran his 1994 re-election, and
14 I ran his 1988 re-election campaign.

15 Q I would like to talk a bit about what
16 your duties as political director at the NRSC
17 were. And I'm going to put them in the past
18 tense because we're going to be looking at
19 1995-1996. I guess I was thinking that you
20 were still that; so it is all past tense.

21 A That is correct.

22 Q Right. Generally speaking, what were

1 your responsibilities as the political
2 director?

3 A Well, in that job there were, sort
4 of, three parts to the job as political
5 director. One was to provide support services
6 to candidates and campaigns who were seeking
7 election to office.

8 The other was -- the second was, I
9 had institutional responsibilities to the NRSC.
10 And by that I mean that I did a fair amount of
11 public speaking to associations, interest
12 groups, to college students, various -- just
13 various groups that request someone to come in
14 and talk about the Senate races and what the
15 NRSC did and how it functioned and so forth.

16 And the third part was basically to
17 serve the chairman, and in that capacity I
18 wrote remarks for the chairman and did
19 briefings for the chairman and that kind of
20 thing.

21 Q Okay. Going back to the first one,
22 what kind of support services did you oversee

1 for candidates?

2 A Well, for example, assisting them
3 with the press, particularly for people who
4 hadn't run before and were not familiar with
5 how to set up a press operation. We would show
6 them how to do news releases; explain some of
7 the logistics of what you have to do when you
8 are setting up a press conference; instruct
9 them in radio actuality, how to do radio
10 actuality so that they understood that.

11 Q What's that?

12 A A radio actuality is when you
13 actually provide a tape or a live feed or they
14 can call in. A radio station can call in to
15 get a real person talking as opposed to simply
16 having a press release to read. So they can
17 actually hear the voice. That's what is called
18 "actuality"; it's the actual voice from the
19 person who makes the statement as opposed to a
20 reporter having to read what so-and-so said.

21 Q The vocabulary keeps building. Did
22 you help candidate committees organize

1 themselves; was that part of the advice you
2 gave?

3 A I'm not sure I know exactly what you
4 mean by "organize."

5 Q I mean how to set themselves up.

6 A We did help them do, like, campaign
7 budgets, finance plans. We would tell them --
8 we would give them instructions, sort of. A
9 campaign would generally have a campaign
10 manager or press secretary. Is that what you
11 mean by "set up"?

12 Q Yes.

13 A Right. That's exactly what we did,
14 yes.

15 Q Did you advise them on fund-raising?
16 I think you just said that, finances and the
17 fund-raising, per se?

18 A We did provide assistance on
19 fund-raising. I had a financing services unit
20 that helped draft, like, the financial plan
21 with them and helped them figure out how they
22 were going to raise money.

1 We did provide fund-raising
2 assistance to them; however, we did that in the
3 post-primary mode, not in the pre-primary mode,
4 the actual assistance with fund-raising.

5 Q And is it correct that Precilla Russo
6 was the person who was head of the --

7 A She was the director.

8 Q And she was under your supervision?

9 A That is correct, she was.

10 Q Did polling -- I should start with
11 that -- come under your supervision,
12 responsibilities?

13 A Yes, it did.

14 Q Who was primarily responsibility for
15 that?

16 A Greg Strimple.

17 Q What about research kinds of
18 activities; was that under your bailiwick?

19 A Yes, it was.

20 Q Any particular person who headed that
21 up?

22 A There were a couple of research

1 directors while I was there, because one person
2 did it, sort of, the first year, and then he
3 left and another person came in.

4 Q Who were those people?

5 A The first person was Sonny Scott.

6 Q And the second person?

7 A Jamie Moore.

8 Q Did that include research into
9 issues, what issues would be good in a
10 particular campaign, that kind of thing?

11 A They did all the research for us.
12 The research unit handled all the research, any
13 research that we wanted to have done.

14 Q And opposition research too; right?

15 A Correct, all kinds of research.

16 Q What about advertising, media
17 advertising; was that within your
18 responsibilities?

19 A Yes, it was.

20 Q And was there a particular person who
21 was charged with overseeing that under you?

22 A I was actually the person who oversaw

1 the media advertising.

2 Q We'll come back to that. I'm trying
3 to get a feel.

4 A Okay.

5 Q There was also, I believe, an
6 activity involving working with political
7 action committees, with PACs; was that correct?
8 You did a liaison with --

9 A I think -- well, you must be talking
10 about our corporate affairs division. I didn't
11 have any responsibilities at all.

12 Q Red Ray Hall was the name of the
13 person --

14 A Yes, he was director of corporate
15 affairs.

16 Q So that was separate from you?

17 A Yes, I had no responsibility.

18 Q Did you have regional field directors
19 or regional directors?

20 A I had field staff.

21 Q When you say "field," do you mean
22 they actually were living in the field or --

1 A No, they weren't. They actually were
2 based in Washington, and they traveled around
3 as they needed to. But we did not have people
4 posted in field locations.

5 Q Is it correct that Wes Anderson was
6 one of those persons?

7 A Well, actually Wes was. Early in the
8 cycle, he left and took another position, and I
9 think he was there about nine or ten months, as
10 I recall. It could have been longer, but he
11 was not there the whole time.

12 Q Nine or ten months in '95, then?

13 A Right.

14 Q So he left before '96 began?

15 A I think he did. It might have been
16 right at the beginning of the year.

17 Q Is it correct while he was there he
18 was responsible for the State of Montana?

19 A He was responsible for everything,
20 because he was the only field staff we had at
21 that time.

22 Q Oh, okay.

1 A Yes.

2 Q I've also seen him designated as a
3 "coalitions director"; was that correct? That
4 was another part of his portfolio, so to speak?

5 A Yes, that is correct.

6 Q What did that mean?

7 A Oh, he was the person who met with
8 various groups in Washington and would provide
9 campaign updates and that kind of thing to
10 them.

11 Q When he left, who took over his role
12 as a field representative?

13 A When he left, no one particular
14 person took over his role. We phased up as the
15 cycle went on, hiring people. And I believe
16 the first person we hired was Marty Ryall. He
17 was the first field staff we hired.

18 Q How do you spell his last name?

19 A R-y-a-l-l. But he didn't really take
20 over all of Wes' responsibility because Wes, as
21 I said, had the whole country. So Marty came
22 on as we were actively interviewing and hiring

1 and bringing other people on, and then other
2 folks came on. So no one really took Wes'
3 place entirely.

4 Q Two names that I've seen are Phillip
5 Griffin --

6 A Yes.

7 MR. BURCHFIELD: Ms. Barnhart, if you
8 could wait for her to finish her question. It
9 makes it very difficult for the reporter to
10 take it down if you talk over each other.

11 THE WITNESS: Okay. I apologize.

12 BY MS. WEISSENBORN:

13 Q I'm probably guilty of that too. And
14 the second name is Sheila Harrington.

15 Was Sheila also a field
16 representative?

17 A No, she wasn't. She was not a
18 political field staff person.

19 Q Oh, I have her as a field finance
20 representative; is that --

21 A Yes, she was that.

22 Q But they were all located here in

1 Washington; is that correct?

2 A That's correct.

3 Q Was there anyone in the State of
4 Montana that was directly a representative or
5 was posted there during in the 1995-1996
6 election?

7 A No.

8 Q Was part of your responsibilities
9 also to work with the Senatorial Trust program?

10 A I didn't work with the Senatorial
11 Trust program. What I was was a guest speaker
12 at the events. I would go in and talk about
13 what was happening in the election, and that
14 kind of thing.

15 Q Was there anyone else that was
16 responsible for that?

17 A It would have been somebody in
18 finance, in financial -- not my financial
19 services, but in the finance department.

20 Q So when you say your "financial
21 services," you're talking about helping the
22 candidates with fund-raising and their

1 finances; is that correct? Is that how it
2 worked, or what would be your financial part?

3 A Our financial services, not mine.

4 Q Yes.

5 A My financial services assisted, as I
6 said before, in drafting and helping them
7 develop finance budgets, a campaign budget, a
8 finance plan, helping them with events and
9 those kinds of things.

10 Q Right. Was there a particular person
11 in the other finance office that headed up the
12 Senatorial Trust program?

13 A Yes, there was.

14 Q Who was that?

15 A I believe it was Don A. Davis.

16 Q Was another part of your
17 responsibilities working with state party
18 committees?

19 A Yes, it was.

20 Q Were you the liaison on behalf of
21 candidates with the state party committees, or
22 how did that work?

1 A I oversaw that. My field staff
2 basically served as the liaison to state
3 parties on an individual basis. But I did from
4 the oversight perspective.

5 Q Who served as the chairman of the
6 NRSC in '95, '96?

7 A Senator D'Amato.

8 Q Do you meet with him very often? You
9 said that part of your job was to brief him;
10 were you on a daily-contact basis with him?

11 A No.

12 Q In other words, how involved was he
13 on a day-to-day basis with what you were doing?

14 A On a day-to-day basis, what, with
15 what I was doing? It wasn't day to day. It
16 was really at special points in time, when
17 there was a circumstance or event or reason for
18 me to be directly involved.

19 Q Were there particular programs that
20 he was more interested in than others?

21 A I don't know. You would have to ask
22 him. I really don't know about that.

1 Q Did he have to approve expenditures
2 that you wanted to make? Officially, did he
3 have to?

4 A It depended. I don't recall him
5 approving the, sort of, general operational
6 things that we did at the Committee, and I
7 don't know exactly how that worked because I
8 wasn't the person --

9 Q But for your programs, were there
10 certain types of categories of expenditures
11 that he would have to approve?

12 A Not that I'm aware of.

13 MR. BURCHFIELD: I was just looking
14 at the subpoena here, which asks the "National
15 Republican Senatorial Committee to designate
16 the person or persons who were knowledgeable to
17 appear for a deposition with regard to contacts
18 between the NRSC and Dennis R. Rehberg and
19 between the NRSC and Montanans for Rehberg in
20 1995 and 1996."

21 That's a fairly limited and focused
22 inquiry. Now, I don't have any objection to

1 you asking a certain amount of background
2 information to learn about this witness and to
3 establish the foundation that she is the
4 appropriate person to testify about those
5 topics. But I don't think -- I'm sure we were
6 not anticipating, and I don't think you are
7 really entitled to do a broad range of inquiry
8 into the business of the Senatorial Committee.

9 So if you could move your examination
10 into the portions that are focused on in the
11 subpoena, I think that would be appropriate.

12 MS. WEISSENBORN: Well, these are
13 questions that do apply to the specifics that
14 we'll be getting to very soon. But I needed to
15 understand exactly what areas of NRSC
16 activities she was responsible for.

17 MR. BURCHFIELD: And that's fair.
18 But I think you've pretty much accomplished
19 that goal. I think we are getting a little bit
20 beyond the pale when you begin asking about
21 Senator D'Amato's day-to-day activities here,
22 unless you can tie that somewhat to the Rehberg

1 matter. But please go ahead.

2 BY MS. WEISSENBORN:

3 Q Who was the executive director while
4 you were there?

5 A John Heubusch.

6 Q And is he still there?

7 A No, he's not.

8 Q It's my understanding that often
9 candidates would use NRSC's facilities for
10 events. First of all, was that true they would
11 use it for their own events?

12 A They did use the NRSC for events,
13 yes, they did.

14 Q Who was in charge of that kind of
15 activity; was that you? Did you help the
16 candidates schedule use of a room or something
17 like that?

18 A In terms of scheduling use of a room?

19 Q Yes.

20 A Yes, I did.

21 Q So that was within your bailiwick
22 also?

1 A For scheduling a room for, say, a
2 press conference or something like that, or for
3 a meeting if they were going to a meeting with
4 campaign staff when they were in town, yes, I
5 did do that.

6 Q During 1995 and 1996, did you
7 maintain a written daily calendar of
8 appointments?

9 A The only thing I maintained was a
10 desk-blotter thing that I would use to make
11 notes on occasion about meetings.

12 Q Did you keep that?

13 A Oh, no, no.

14 Q You didn't have an appointment book
15 or anything like that?

16 A No, I didn't.

17 Q Did you maintain a log of telephone
18 calls that you made?

19 A No, I didn't.

20 Q Or of calls that came in?

21 A No, I didn't.

22 Q Did anyone else on your staff do that

1 for you?

2 A Not that I'm aware of.

3 Q Any kind of log of visitors,
4 candidates coming in for visits; that kind of
5 thing?

6 A No, I didn't.

7 Q Again, they're general questions, but
8 they're focused on you in your role as
9 political director, the kind of expenditures
10 that you were responsible for authorizing.

11 MR. BURCHFIELD: Let's focus on the
12 demurrer in this case. This really is not an
13 appropriate opportunity, given the amount of
14 business that the NRSC does with the Federal
15 Election Commission, this really isn't an
16 appropriate setting for a broad-scale inquiry
17 about the activities of the NRSC.

18 Ms. Barnhart is here. She's ready to
19 answer the questions related to MUR 4378, but
20 there are, as I think you know,
21 Ms. Weissenborn, a number of matters going on
22 between the NRSC and the Federal Election

1 Commission, including a number of them in which
2 the Federal Election Commission has not
3 authorized its staff to conduct any
4 investigation as of yet.

5 So I think it's appropriate to focus
6 this deposition on the subject matter of 4378.

7 MS. WEISSENBORN: Well, I think it's
8 also important to realize this MUR is not in a
9 vacuum, and that I'm not asking for specifics
10 of any other matters. I don't know what they
11 are necessarily.

12 MR. BURCHFIELD: That's why, as of
13 this point in time, you're not entitled to know
14 what they are unless they are connected to the
15 issues raised in MUR 4378.

16 Indeed, the subpoena that I assume
17 you drafted says, "This deposition is with
18 regard to contacts between the NRSC and Dennis
19 R. Rehberg and between NRSC and Montanans for
20 Rehberg in 1995 and 1996."

21 The question that you were just
22 asking appears to relate to the sorts of

1 expenditures that Ms. Barnhart was involved in
2 making, without any limitation to Montanans for
3 Rehberg, without any limitation to the
4 1995-1996 Rehberg campaign. And indeed, it
5 would be appropriate, I think, for you to ask
6 the initial question as to whether there were
7 any such expenditures.

8 MS. WEISSENBORN: So are you advising
9 her not to answer? Suppose I was to ask about
10 issue advertising in general?

11 MR. BURCHFIELD: We'll take it on a
12 question-by-question basis. But what I'm
13 saying is, and I can't imagine you would
14 disagree with this: It is not appropriate for
15 you to use this deposition as a way to inquire
16 about the broader workings of the NRSC.
17 They're not pertinent to the MUR, and they're
18 not even specified as a part of the deposition
19 notice.

20 So if you have a question that you
21 want to ask that is focused in some way on the
22 issues involved in MUR 4378, and it comes

1 within your subpoena, I'll let her answer it.

2 So go ahead.

3 MS. WEISSENBORN: All right. We'll
4 take them one at a time.

5 MR. BURCHFIELD: Okay. Sounds fair
6 to me.

7 BY MS. WEISSENBORN:

8 Q Were you the person who authorized
9 payments of contributions, out-and-out NRSC
10 contributions, to candidates? Was that part of
11 your responsibility?

12 A I'm not sure I understand what you
13 mean by "contributions to candidates."

14 Q For example, where you would make or
15 the NRSC made a payment to a candidate.
16 \$17,500 was the amount, the limit, that's
17 allowed. If they made contribution like that
18 to individual candidates, were you the person
19 who authorized that?

20 A I had to approve that.

21 Q "Approve," that's the word. Okay.

22 A I had to approve it.

1 Q What about coordinated party
2 expenditures; were you involved in those?

3 MR. BURCHFIELD: You may answer with
4 regard to the Rehberg campaign.

5 MS. WEISSENBORN: All right.

6 THE WITNESS: Yes. I was involved in
7 knowing that coordinated expenditures were
8 compensated, giving money to them for that
9 purpose. I was involved in that, not actually
10 the giving of the money but knowing and
11 agreeing that that should occur.

12 MR. BURCHFIELD: I assume your
13 question refers to the post-primary period for
14 coordinated expenditures?

15 MS. WEISSENBORN: I'm sorry?

16 MR. BURCHFIELD: Your question, in
17 terms of timing -- the timing is important
18 here -- the question refers to the post-primary
19 period?

20 MS. WEISSENBORN: That's right.
21 Correct.

22 MR. BURCHFIELD: Is that the way you

1 understood it?

2 THE WITNESS: That is the way I
3 understood the question because that's the only
4 time --

5 BY MS. WEISSENBORN:

6 Q All right.

7 A If I could just make this comment?

8 Q Sure.

9 A I need to clarify something. I
10 understood the question as post-primary because
11 that's the only time that we actually approved
12 coordinated expenditures. So I think that was
13 important.

14 MS. WEISSENBORN: Right. Could you
15 read back her answer to the question just
16 before that one, before the clarification?

17 (The reporter read the record as
18 requested.)

19 BY MS. WEISSENBORN:

20 Q The "them" you're referring to is the
21 candidates?

22 A What I was talking about was knowing

1 and agreeing that the coordinator's dollars
2 should be given.

3 Q Or spent?

4 A Not necessarily spent, but I mean --
5 well, given to the candidates.

6 Q Okay. Now, this next series of
7 questions is on the question of issue
8 advertising, which is the program that we are
9 concerned with in terms of Mr. Rehberg. But I
10 have some general questions before we start
11 that about that kind of program.

12 Did the NRSC have a program in '96 to
13 produce and place media advertising that it
14 deemed or had entitled "issue advertising"?

15 MR. BURCHFIELD: Object to the form
16 of the question. This MUR is not a general
17 inquiry about the NRSC's issue advertising.

18 Ms. Barnhart, you may answer the
19 question as to whether there were issue
20 advertisements run in Montana during the time
21 you were there.

22 THE WITNESS: Yes, there were. There

1 was issue advertising done in Montana while I
2 was there in 1996.

3 MS. WEISSENBORN: I would like to
4 introduce this document as Exhibit No. 2,
5 please.

6 (Barnhart Deposition Exhibit
7 No. 2 was marked for
8 identification.)

9 BY MS. WEISSENBORN:

10 Q This is just for the purposes of you
11 telling me whether this is a type or a sample
12 of one of the ads placed in Montana that you
13 are talking about?

14 A I don't remember this ad
15 specifically, but yes.

16 Q That's the kind of ad that you're
17 talking about?

18 A Well, this could well have been one,
19 but I just don't remember the specifics.

20 Q Was this part of a formal program
21 that had a name? I don't know, for example,
22 like "Victory '96," or something like that?

1 A It had no name. It was part of the
2 legislative advocacy.

3 Q If it had a name, that would be what
4 it was designated as?

5 A Yes.

6 Q When did you begin this legislative
7 advocacy, these ads?

8 MR. BURCHFIELD: Referring to the
9 issue ads run in Montana of the sort of Exhibit
10 No. 2.

11 THE WITNESS: The ads in Montana we
12 did, I believe, in the spring of '96, which
13 would have been March, April, May, something
14 like that.

15 BY MS. WEISSENBORN:

16 Q What did the NRSC have as a purpose
17 of this program?

18 A The purpose of the program was to
19 promote the Republican agenda.

20 Q What agenda?

21 A The agenda of the leadership in the
22 Congress. We would receive internal calendars

1 from the Leader's office showing us the votes,
2 the planned votes, or the tentative schedule
3 that they wanted to follow in terms of bringing
4 issues before the Senate for a vote. And so we
5 would look at that and decide which issues we
6 wanted to advocate, to help pass the agenda in
7 the Congress.

8 Q So were you the person primarily
9 responsible for managing this program of
10 advertising?

11 A Yes, I was.

12 Q Fine. Did you consult with Senator
13 D'Amato on the contents, such as advertising?
14 Was he involved in that kind of thing?

15 A No, he wasn't.

16 Q Who was? First of all, who made the
17 decisions about the content?

18 MR. BURCHFIELD: We're still
19 referring to the Montana issue.

20 MS. WEISSENBORN: I'm talking
21 generally.

22 MR. BURCHFIELD: Well, in that event,

1 I think you're beyond the scope of the
2 investigation as well as your own subpoena.

3 I don't have any objection to her
4 answering questions about who was involved in
5 the issue ads that actually aired in Montana.
6 That is, as I understand it, within the scope
7 of your investigation.

8 But if you're trying to find out
9 about issue ads that were aired in Rhode Island
10 or aired around -- I don't know -- then that
11 just isn't part of this investigation. It's
12 not subject to the subpoena. If you focus your
13 question on the issue of ads in Montana, I have
14 no objection to that.

15 BY MS. WEISSENBORN:

16 Q For now, let's say for the ones in
17 Montana.

18 A I'm sorry. I'm lost.

19 Q Would Senator D'Amato have been
20 involved in working on the issues that were
21 raised in the Montana ads?

22 A No, he wouldn't have been.

1 Q Therefore, the next question was,
2 then who was? Who decided upon which issues to
3 use?

4 A Myself and the other people in my
5 staff worked on it, sort of a team approach.

6 Q What about --

7 A But again, let me just clarify here.
8 You asked who would decide what issues we would
9 place?

10 Q Yes.

11 A Again, it was driven by the calendar
12 that I discussed, because we basically looked
13 at the calendar of the votes. I think at that
14 time it was, I guess, Senator Dole in the
15 beginning and then Senator Lott, who would put
16 out to show what issues were going to be coming
17 before -- what things were coming up for a
18 vote. So it was in that context we made those
19 decisions.

20 Q Who was it that decided on the timing
21 of the placement of the ads?

22 A Well, again, that was driven by the

1 calendar. Because our understanding of
2 legislative advocacy was it was an issue that
3 was before the Congress that was coming up or
4 was under consideration by the Congress. So
5 the timing was really driven by when the vote
6 was either planned to be scheduled or was
7 actually scheduled or actually occurred.

8 Q Why is it that you determined to
9 place these ads so that they would be beamed
10 into or within Montana? Why was Montana a
11 state that was of interest?

12 A Well, there were a couple of reasons
13 for that. One is that Montana is a very
14 inexpensive state to run the television -- I
15 think a week of television in Montana runs
16 somewhere around \$27,000, give or take a few
17 thousand, but somewhere around there. This
18 wasn't a -- we didn't want to spend all of our
19 money, obviously, on issue ads. And so
20 relatively speaking, it was a very inexpensive
21 state compared to other states.

22 Also, Senator Baucus was on the

1 finance committee. He had been a supporter of
2 welfare reform. He had, sort of, broken rank
3 with the Democrats on that issue. He was the
4 only one who did, and in fact, he ended up
5 later voting for welfare reform even on the
6 floor.

7 So we thought that he was the
8 person -- we were very close on the Balanced
9 Budget Act to getting the amount of votes that
10 we needed. We were just one or two shy. And
11 so we wanted to spend our money the best place
12 we could in terms of the likelihood of
13 convincing someone to change their mind.

14 So the whole issue was that we lost
15 by one vote, and if we could convince one more
16 senator to vote for it, then it was a
17 significant agenda that it would pass. And so
18 that is the second reason we focused on
19 Montana.

20 Q Now, is it correct that the Montana
21 ads were allocated between your federal and
22 nonfederal accounts? Is that correct that they

1 were treated as allocable expenditures?

2 MR. BURCHFIELD: Object, foundation.

3 You may answer.

4 THE WITNESS: To be honest, I wasn't
5 the person who handled the accounting stuff. I
6 assume it was -- I mean, I remember discussions
7 about that, but that wasn't really my job, so.

8 BY MS. WEISSENBORN:

9 Q By way of foundation, the first ads
10 in Montana were placed prior to the primary
11 there in June. The first ones, I believe, were
12 in April.

13 So did you consult with any of the
14 Republican candidates about the fact that these
15 ads were going to be placed?

16 A No.

17 Q Did you talk to anybody, either
18 candidates or their staffs, about the content
19 of the ads that you were thinking about?

20 A No, absolutely not.

21 Q Or the timing of them; did you talk
22 about that with any of them?

1 A No, we didn't.

2 Q Did the candidate committees,
3 Republican candidate committees, play any role
4 in the conceiving of these advertisements?

5 A No, they didn't, because --

6 Q Would you have any conversations with
7 any of their consultants or people that you
8 knew to be consultants with Republican
9 candidates in Montana about these ads?

10 A No, I didn't.

11 Q Did you have any idea that they would
12 have had an influence or an effect on the
13 campaign themselves?

14 A I'm sorry?

15 Q Did you have any discussions among
16 yourselves, within the NRSC, about any effect
17 that these ads might have upon the campaigns of
18 these Republican candidates?

19 A The purpose of the ads was to try to
20 promote the Republican agenda. The purpose was
21 to try to get another vote for the balanced
22 budget or whatever issues we did. That was the

1 purpose of the ad.

2 Q Prior to the time that the ads ran,
3 did you inform the candidates, the Republican
4 candidates in Montana, that they were going to
5 be appearing?

6 A No, we didn't.

7 Q After they started to run, did you as
8 part of your policy share the scripts or videos
9 with the candidates?

10 A Our policy, pretty much, was that
11 after they went up, the ads went up, and they
12 were actually on the air and running, we called
13 the campaign, whatever campaign, and let them
14 know. And we did that, like I say, the day --
15 usually the day they went up, and we probably
16 did provide a copy of the script, although I
17 don't remember doing it specifically.

18 The reason I say that we probably did
19 is because we, as a matter of course,
20 oftentimes we did provide the scripts to anyone
21 who would ask, basically, once the ads went.
22 So I imagine we probably did. I don't remember

1 specifically doing it, but we probably did.

2 Q Would this have been a policy in
3 general or only applied to Montana?

4 First of all, let me go back. The
5 policy of not conferring with the candidates
6 prior to the placement of the ads; was that
7 specific to Montana or a general policy?

8 A That was a general policy that I
9 engaged in on advice of my legal counsel.

10 Q But then the sharing with them after
11 the fact, was that a general policy in any
12 state that happened to be affected?

13 A There was a general policy because
14 once the ad was up and running and it had been
15 produced, yes.

16 Q Once a candidate saw or heard a
17 particular ad or set of ads, did you have
18 someone call you and say, "Please stop"?

19 A I don't remember specifically anyone
20 doing that.

21 Q Do you have a general memory of that
22 happening?

1 A It's possible someone did, but I got
2 so many phone calls; that's why I say that I
3 don't remember specifically.

4 Q It is correct that Dennis Rehberg was
5 a Republican candidate for nomination to the
6 U.S. Senate from Montana in 1995-1996?

7 A That is correct.

8 Q And is it correct that he was the
9 eventual Republican nominee?

10 A Yes, that is correct.

11 Q Were you acquainted with Mr. Rehberg
12 prior to 1995?

13 A Oh, no.

14 Q When did you first meet him?

15 A I don't remember the exact date, but
16 it was in 1995, and I think it was probably the
17 summer of '95, June, July, August, somewhere in
18 there. I think I had been at the committee
19 about six months or something like that.

20 Q What kind of activities do you
21 remember the NRSC undertaking on his behalf
22 that you would have been involved with?

1 A Well, are you talking --

2 Q Either before or after the
3 nomination.

4 A Okay. I was going to say, because
5 before the nomination we would have -- I don't
6 remember, like, a lot of specifics, but I know
7 generally what we did. We had a policy of
8 general things that we did for candidates
9 pre-primary, and we followed that with all our
10 candidates.

11 Q What kinds of things would that have
12 been?

13 A Oh, we would have helped them do the
14 things I talked about before, write a campaign
15 budget, write a finance plan. If he were
16 looking for consultants for various parts of
17 his campaign, we would set up interviews with
18 five or six different people. But I don't
19 remember doing it specifically with Dennis.
20 I'm just saying those were the kinds of things
21 we did.

22 Q Do you ever go out to Montana to meet

1 his campaign?

2 A No, I didn't.

3 Q Somewhere in something I saw a
4 reference to a Denver event that you may or may
5 not have gone to. Did you go out to Denver on
6 behalf of his campaign?

7 A No, I didn't.

8 Q Do you know Eddie Mahe?

9 A I do.

10 Q That's spelled M-a-h-e. When did you
11 first meet him?

12 A Oh, I don't remember. I think the
13 first time I meet Eddie was, maybe, in 1988.

14 Q Long time before '95, '96?

15 A I had met him. We weren't close or
16 anything. I had seen him probably two or three
17 times prior to working at the Senatorial
18 Committee.

19 Q To your knowledge, is it correct that
20 his company, Eddie Mahe Company, worked for the
21 Rehberg committee in 1995-1996?

22 A To my knowledge it is correct.

1 Q Are you acquainted with La Donna Lee?

2 A Yes.

3 Q During 1995 and 1996, do you know
4 where she was employed?

5 A She was employed by Eddie Mahe or a
6 partner or something, but she worked with Eddie
7 Mahe.

8 Q Would it have been as an employee of
9 the Eddie Mahe Company that you first got to
10 know her?

11 A It's when I first got to know her,
12 yes.

13 Q From your vantage point at the NRSC,
14 what was the role of Eddie Mahe Company with
15 the Rehberg campaign vis-a-vis your
16 organization?

17 A I'm not sure I understand.

18 Q What was it, from your point of view
19 from your role with the NRSC? How did the
20 Eddie Mahe Company relate to you with regard to
21 the Rehberg Campaign; were they the agent,
22 would you say, or representative of the

1 campaign?

2 A They were consultants to the
3 campaign.

4 Q Were you that company's primary
5 contact with the NRSC?

6 A My guess is I probably was, as
7 political director.

8 Q Did you have frequent contact with
9 either La Donna Lee or Eddie Mahe during that
10 campaign?

11 A I wouldn't call it frequent, but we
12 did have contact, yes.

13 Q When you say not frequent, did you
14 have contact with them on certain subjects once
15 a week or how did that --

16 A Oh, no, no. That's why I say not
17 frequent. I can't really assign a time period
18 to it. But maybe on average, once a month,
19 once every six weeks, not frequent. I mean, I
20 don't call that frequent, so.

21 Q Did you have contact with one of them
22 more than the other?

1 A I definitely had more contact with
2 La Donna than Eddie.

3 Q Was the amount of contact you had
4 with their consultants comparable to that with
5 other Senate campaigns at the time, or was it
6 more or less or --

7 A It was probably less, actually.

8 Q Do you have any idea why that would
9 have been true?

10 A Not really. A lot of it just depends
11 on personalities and whatever, and I just
12 didn't have that much contact.

13 Q The contact you had, what did it
14 usually involve? Particular services that the
15 NRSC was working on for the Rehberg campaign,
16 or what was the subject matter or the contents?

17 A As I remember, the contacts were
18 generally to give an update on how Dennis was
19 doing on fund-raising; that kind of thing, and
20 to make requests for things they wanted to us
21 do. Like, if they wanted us to help -- for
22 example, you mentioned the Denver event, if

1 they wanted us to assist in helping with that
2 event.

3 Q Was that a fund-raising event, if you
4 know?

5 A Yes, it was a fund-raising event.
6 That was something we typically did for
7 candidates to provide assistance.

8 Q What kind of assistance would you
9 have provided?

10 A Oh, we would have given them advice
11 on how to set up the place, logistically, doing
12 like a line-by-line in terms if there were
13 special people coming, assisting them in
14 raising money, you know, just --

15 Q Would you provide mailing lists or
16 invitation lists or things like that?

17 A No, we wouldn't have done that
18 because we didn't have any list to provide
19 outside of the formal list exchange; and also
20 because, as memory serves me, that was a
21 pre-primary fund-raiser, and we didn't do that
22 in pre-primary situations.

1 Q I'm sorry, what is the phrase, the
2 "list exchange"; what was that?

3 A Oh, a list exchange is when a
4 candidate has a list and you trade lists.
5 There are FEC rules that govern this, and my
6 understanding is that it was something that was
7 done fairly often, and there were real strict
8 rules about it. It could only happen at
9 certain times, and it was very closely
10 monitored, so.

11 Q Going back to the Eddie Mahe Company
12 and their representatives, how would you
13 describe your relationship with La Donna Lee
14 and Eddie Mahe during this campaign?

15 A It was cordial.

16 Q Throughout the whole period, you
17 think; do you remember?

18 A It was basically cordial.

19 Q Were there any areas of disagreement
20 that arose during the campaign?

21 A I'm sure there were areas of
22 disagreement, but I think that's fairly typical

1 in any relationship. But it was still
2 basically a cordial relationship.

3 Q As far as Mr. Rehberg's own campaign
4 staff in the state, did you ever meet Mike
5 Pieper, P-i-e-p-e-r?

6 A Yes, I did.

7 Q Would he come to Washington with
8 Mr. Rehberg; is that how you would have met
9 him?

10 A I don't remember. I think he might
11 have come with Dennis once. I don't know
12 whether he came with Dennis or not. I can only
13 speak to when I saw him. He may have come in
14 with Dennis one time.

15 Where I remember Mike Pieper best,
16 from meeting him and getting to know him a
17 little bit, we had a campaign school, like a
18 training event, and we invited representatives
19 from all the campaigns across the country, and
20 Mike Pieper came to that.

21 Q Would this have been before or after
22 the nomination?

1 A Oh, it was before. It was definitely
2 before.

3 Q What about Elizabeth Bonforte?

4 A I remember that name and -- gee, I
5 can't remember what Elizabeth did.

6 Q I believe she was the assistant
7 campaign manager.

8 A She may have been, I just --

9 Q Steve McCarter, who was the press
10 manager?

11 A I don't know him, no.

12 Q Stan Ullman, finance director?

13 A No.

14 Q Janice Reaper?

15 A Jan, I do remember, yes.

16 Q Aside from the campaign school, do
17 you ever remember meeting with any of these
18 individuals separately from a meeting with
19 Mr. Rehberg? You know, he would be off doing
20 one thing, and somebody else from his campaign
21 would come in and meet with you?

22 A Mike Pieper stopped by the office

1 right before he went out to work in Montana. I
2 mean, he was moving out to Montana. He did a
3 stop-by just to say, "Hello, I'm Dennis
4 Rehberg's new campaign manager." It was
5 literally like five minutes. Other than that,
6 I don't remember any of the individuals you
7 just mentioned coming by the office.

8 MS. WEISSENBORN: Okay. Let's take a
9 five-minute break.

10 MR. BURCHFIELD: All right.

11 (Recess)

12 MS. WEISSENBORN: I want to go back
13 just a minute to address your concern about the
14 preface to the subpoena. The language in that
15 preface telling what was going to be the
16 subject matter wasn't intended to limit that.
17 It was more a courtesy to let your client know
18 what was going to be the main focus of the
19 inquiry. Everything else that we ask,
20 certainly, is viewed as relevant. We're not --

21 MR. BURCHFIELD: Is this on the
22 record?

1 MS. WEISSENBERG: Yes.

2 MR. BURCHFIELD: You may view this
3 record as relevant, but I don't. And indeed,
4 the subpoena, had these issues been pertinent
5 to the examination or of central importance to
6 the examination, I assume you would have listed
7 them there. And indeed, in the factual legal
8 analysis that underlies the reasonable belief
9 fund, which is the charter for your ability to
10 conduct the deposition and the investigation,
11 is focused on the complaint relating to the
12 issue ads run in Montana.

13 I'm sure you appreciate my situation.
14 I represent a client that is a political
15 committee. It files reports on a timely basis
16 with the Commission. It has a lot of
17 complaints filed against it at the Commission.
18 It does a lot of business with you guys.

19 We can't come over here for
20 depositions and subject a witness, who we had
21 thought was going to be talking about one
22 matter, to a broad range of inquiry from the

1 business of the Senatorial Committee. That
2 isn't fair, for one thing, and it's not
3 required, for another.

4 So that's all I'm doing. I'm not
5 trying to be difficult. I'm just trying to
6 focus the deposition in on the matters that
7 are, ultimately, going to be pertinent to the
8 resolution of this investigation.

9 I really don't think I'm being
10 unreasonable. In a federal court subpoena, if
11 you issue a 30(b)(6) subpoena to an entity to
12 produce a witness to give a deposition, then A,
13 you have to list the topics you're going to ask
14 about, and B, the witness is not required to
15 answer questions that are beyond that, other
16 than nominal background information. The case
17 law on that is really very strong.

18 MS. WEISSENBORN: This is not a
19 court, and I think the Commission and you have
20 a difference of opinion as to what is the
21 legitimate subject matter for this.

22 MR. BURCHFIELD: I appreciate that.

1 And if there are particular areas of inquiry
2 that you think are necessary for your
3 investigation that don't appear on their face
4 to be related to the issue that is at issue
5 here, I am persuadable on it. But I can't in
6 good conscience and in good service to my
7 client allow this to turn into broad range of
8 inquiry.

9 I've been in depositions where other
10 staff members of the FEC have tried to use
11 particular cases and particular MUR
12 investigations to investigate matters that go
13 well beyond the scope of those cases. I'm very
14 sensitive to that issue. If you've got matters
15 that you think are pertinent that I don't agree
16 with you on, I'm persuadable on it, but I think
17 you understand my position.

18 MS. WEISSENBORN: Okay.

19 MS. BUMGARNER: I was just going to
20 say, and I think Anne said it well, but there
21 is a difference of opinion. I would just like
22 to say that we are focusing on the Rehberg

1 campaign. But as Anne said earlier, we don't
2 operate in a vacuum, and we don't know certain
3 things about issue ads.

4 What we're trying to learn has
5 nothing to do with other MURs or anything like
6 that. It's all within the confines of this
7 MUR. But in order for us to better understand
8 what happened with the Rehberg campaign, it's
9 helpful for us to find out a little bit more of
10 a broad-based knowledge of just the issue
11 advertising in general.

12 That's not to be used in the context
13 of any other case. It's just for us to be able
14 to ask better questions with more insight.

15 MR. BURCHFIELD: Are you telling me
16 that the information in this deposition is not
17 going to be made available to persons who are
18 working on other matters pending against the
19 NRSC?

20 MS. BUMGARNER: I'm not saying that.
21 What I'm saying at this point is the questions
22 we are asking are not focused on any matter

1 except for this one at hand.

2 And if Anne will continue asking her
3 questions, and you can state your objections as
4 we go along.

5 MR. BURCHFIELD: And I'm really not
6 trying to be difficult.

7 MS. WEISSENBORN: We're not trying to
8 either.

9 MR. BURCHFIELD: We're spending an
10 awful lot of time, it seems to me, arguing
11 about this. As I previously told you, no one
12 ever reads lawyer colloquy in a deposition. I
13 know that.

14 MS. BUMGARNER: Now we know why.

15 MS. WEISSENBORN: It's hard enough
16 for us to read the deposition.

17 MR. BURCHFIELD: Exactly. So I think
18 we're taking up time on something that may turn
19 out not to be as a big a problem. As we've
20 decided, ask your questions; I'm taking them on
21 a question-by-question basis.

22 I don't think is that I've precluded

1 Ms. Barnhart from answering something that is
2 reasonably related to the Montana situation.
3 So go ahead. If we have a dispute, we'll have
4 a civil, professional disagreement, and we'll
5 determine how to resolve it later on.

6 MS. BUMGARNER: That sounds fair.

7 BY MS. WEISSENBORN:

8 Q Just going back a little bit to
9 something you mentioned before, and you said
10 you had not discussed the issue ads, content,
11 timing, and so forth, with Mr. Rehberg or
12 anybody on his campaign; is that what you said?

13 A That is correct, yes.

14 Q And that you, in a more general
15 sense, had not done this with other candidates
16 also; is that correct?

17 A That is correct.

18 Q Would you expand a bit on why not,
19 why you did not discuss it with him?

20 MR. BURCHFIELD: Well, let me
21 instruct the witness that she may answer the
22 question, but please, to the degree your answer

1 might touch upon conversation you had with
2 counsel for the NRSC, please do not disclose
3 the substance of those conversations.

4 THE WITNESS: It was upon advice of
5 legal counsel, which I believe I said before.
6 That's the reason that I didn't.

7 MS. WEISSENBERN: But you're
8 instructing her not to go beyond that?

9 MR. BURCHFIELD: That's right. It
10 would be a privileged communication, that the
11 NRSC legal counsel had a conversation about a
12 legal issue with his client.

13 BY MS. WEISSENBERN:

14 Q Then you went on -- or maybe it was
15 before -- to talk about the linkage that you
16 see between issue ads and legislation before
17 the Congress.

18 Since your argument is that these
19 were legislatively oriented ads, was there an
20 ad program in all of the 50 states?

21 MR. BURCHFIELD: I'll object as to
22 the question. I just don't think it's

1 pertinent to this investigation, although I
2 could be persuaded on that. Why do you think
3 it is pertinent?

4 MS. WEISSENBORN: Because if it were
5 legislative, then it seems that one would be
6 focusing on more than just a particular state
7 or a certain set of states. I don't know.
8 That's the question.

9 MS. BUMGARNER: Yes.

10 MS. WEISSENBORN: That's the
11 question: What was the criteria for what
12 states the ads were run in?

13 MR. BURCHFIELD: Well, all right. I
14 will let her answer the question as to whether
15 there were issue ads run in other states. If
16 you want to follow up with the question of why,
17 if there were not ads run in all 50 states,
18 Montana was chosen, you may ask that question
19 as well. But I really don't want to get into a
20 situation discussing why or why not ads were
21 run in Rhode Island, to use the example we used
22 before.

1 BY MS. WEISSENBORN:

2 Q Were there ads run in all 50 states?

3 A No, there were not ads run in all 50
4 states.

5 Q And if not, then what did you look
6 for in terms of looking for which states to run
7 them in?

8 A Well, as I explained earlier, with
9 regard to Montana, I think I explained the
10 situation where on the Balanced Budget Act, for
11 example, we had a very close vote; that Max
12 Baucus had broken ranks with the Democrats on
13 the welfare reform; therefore, the Republicans
14 were trying to find one or two people to change
15 their votes. He looked like he might be a good
16 candidate to do that because of the fact that
17 he had been willing to not vote party line on
18 another issue.

19 And also, because Montana was a
20 relatively inexpensive media buy in terms of
21 the budget consideration.

22 Q There are some other states that I

1 would like to mention in a moment, but they
2 come up within the context of some of the
3 documents that we've received, so let's do it
4 at that time, not right now.

5 MS. WEISSENBORN: Let's have this
6 document, this set of documents, as No. 3.

7 (Barnhart Deposition Exhibit
8 No. 3 was marked for
9 identification.)

10 BY MS. WEISSENBORN:

11 Q Now, the calendars that I'm going to
12 show you we have received from the Rehberg
13 campaign --

14 MR. BURCHFIELD: If we could use the
15 original, the one that's marked, that would be
16 great.

17 MS. WEISSENBORN: Oh, all right.
18 That's fine.

19 BY MS. WEISSENBORN:

20 Q I'm asking you really just to see if
21 this triggers your memory in terms of
22 particular events. The only ones that are

1 highlighted there are NRSC-related events.

2 So, obviously, you have not seen this
3 before?

4 A No, I haven't.

5 Q On the page 2 for Monday, July 17,
6 1995; down at the bottom it says, "5:30 p.m.,
7 Meeting with Senator Alfonse D'Amato."

8 Do you remember going to a meeting
9 with Senator D'Amato and Mr. Rehberg? Do you
10 think you were at this meeting?

11 A I do remember going to a meeting with
12 them. I don't remember that it was necessarily
13 this day. I can't say.

14 Q Okay.

15 A But I do remember being at a meeting
16 with them, yes.

17 Q Was this standard procedure that you
18 would take, in this case, a candidate for the
19 nomination over to meet Senator D'Amato; would
20 you do that for most candidates?

21 A Oh, yes, yes. When people were in
22 town, we made every effort for them to meet

1 Senator D'Amato.

2 Q Do you have any memory of the
3 conversations, whether you talked about things
4 that the NRSC could do for him as a candidate,
5 that kind of thing?

6 A At that meeting with Senator D'Amato,
7 no, we didn't really talk about that. If I
8 recall and it's this meeting, and again, I'm
9 not sure if it's this day, but it was really
10 just a "Hello, how are you" introductory
11 meeting. And we wouldn't have talked about
12 what the NRSC could do for a candidate at those
13 kinds of meetings. They were, really, just a
14 higher-level get-acquainted meetings.

15 Q Who is Beth Walker, the name appears
16 on here?

17 A Beth Walker is an employee through
18 the corporate services division.

19 Q Of the NRSC?

20 A Of the NRSC, uh-huh.

21 Q She apparently was involved in
22 setting up these kind of meetings; is that

1 correct?

2 A She was.

3 I should clarify that Beth changed
4 positions partway through the cycle, and she
5 handled -- she was the person who handled
6 Senator D'Amato's schedule for the Committee.
7 And in fact, now I can't actually remember when
8 she became a member of corporate affairs. It
9 may not have been until the end of the cycle.
10 So she may well have just been the person who
11 handled the schedule and things at that point
12 in time. I really can't remember. Her
13 responsibility was to do Senator D'Amato's
14 schedule for NRSC activities.

15 Q Do you remember anyone else being
16 with you besides you and Mr. Rehberg?

17 A For some reason I think Denny might
18 have had someone else at the meeting, but I
19 can't remember who it was. I really don't
20 remember. But it was typical that candidates
21 would bring their wife or a consultant or
22 something. I just don't remember who

1 exactly --

2 Q Okay. These kinds of meetings, would
3 this be something you would do as part the
4 recruitment of candidates, or would you wait
5 until they actually declared their candidacy?

6 A It depended. It really depended.
7 There wasn't any standard.

8 Q All right. On the next page, which
9 is the next day, July 18, 1995, at 9:00 a.m.,
10 is reported a meeting with John Heubusch, the
11 executive director.

12 Did you go to that meeting with him;
13 do you remember?

14 A You know, I don't really remember. I
15 may have; I don't recall being in a meeting
16 specifically with John, but I could have been.

17 Q So you don't have any memory of what
18 they talked about?

19 A I don't. I really don't.

20 Q Okay. Then the next one at 9:15, is
21 a meeting at the NRSC. It says, "For
22 presentation on Op-research," and lists a

1 series of folks, including yourself, who were
2 there.

3 Do you remember this meeting?

4 A I do remember this meeting. I do. I
5 do remember this meeting.

6 Q Do you remember whether Mr. Rehberg
7 came with anyone else from his campaign?

8 A I'm pretty sure there were other
9 people there with Dennis, but again, it's hard
10 to remember who. I think Tony Paton was there.
11 Yes, Tony was there, and he was a consultant to
12 the Rehberg campaign. And there may have been
13 one or two other people in the room, but to be
14 honest, I don't really remember who they could
15 have been, or who they were, so.

16 Q Again, was this standard procedure to
17 have a group get-together like this with
18 candidates early on in the campaign?

19 A Yeah, this was something we did
20 regularly for all people who were either
21 candidates or told us they were thinking about
22 being candidates. And typically what I would

1 do, and I see here, this is absolutely the
2 group of people it would have been, or somebody
3 from all these parts of those services at those
4 types of meetings.

5 We would introduce ourselves to the
6 people. We would explain the various services
7 that we could provide pre-primary and
8 post-primary and just introduce them, really,
9 to the NRSC. And yeah, it was definitely
10 something that we did many times at the
11 Committee.

12 Q Well, first of all, I should ask,
13 "Op-research," I'm assuming that means
14 opposition research?

15 A I'm assuming that's what it means,
16 but I don't know what it is. I didn't write
17 this. I would assume that's what they mean.

18 Q Sounds like the discussion went
19 beyond just that topic?

20 A Oh, yeah. We would have talked about
21 what we could do from a press perspective. I
22 talked about press releases, et cetera, and

1 separation and so forth, and so Gordon would
2 have talked about that.

3 Precilla would have talked about what
4 the financial services unit could do. We would
5 have talked about -- in fact, we would have
6 talked about what we could provide from our
7 legal department in terms of FEC report,
8 review, and that kind of thing, so.

9 Q You mentioned Gordon, but I don't
10 think we've said his last name.

11 A Hensley, Gordon Hensley.

12 Q And he was head of the communications
13 department; is that correct?

14 A Yes, he was director of
15 communications.

16 Q By "communications" you mean what?

17 A Oh, the press, the media, earned
18 media.

19 Q Was there any discussion at this
20 meeting about advertising, media advertising,
21 that you remember?

22 A No, I don't remember any discussion

1 about that, and I'm sure there wasn't any
2 discussion about that.

3 Q Do you remember any specific plans
4 for the Rehberg campaign that came out of these
5 meetings with Mr. Rehberg and his
6 representatives, promises that were made or
7 plans that were made for what you might do for
8 him?

9 A No. In fact, we wouldn't have made
10 any promises to anyone at that point in time,
11 because the first primary we had in that cycle
12 was in March, and it was in Illinois. I
13 remember because it was an early primary, and
14 then there weren't any primaries until, like,
15 May or June.

16 So we didn't make promises to anyone
17 in the pre-primary situation, because we didn't
18 know who the eventual nominee would be. We
19 didn't make promises in terms of anything.

20 Q It was more of an "if" kind of thing:
21 "If you win, we will do this and that or would
22 be willing to." Is that the gist of it?

1 A Well, it was really more just a
2 matter of saying, "These are the services that
3 we provide to people; this is the kind of
4 situation; these are the things that we're able
5 to do in the post-primary situation."

6 (Barnhart Deposition Exhibit
7 No. 4 was marked for
8 identification.)

9 BY MS. WEISSENBORN:

10 Q Again, this is a schedule that we've
11 received from Mr. Rehberg, and it is shown to
12 you just to trigger your memory, so to speak.

13 On the first page, this is a schedule
14 of a trip that he made to Washington in October
15 of '95, and down at the bottom of the first
16 page, and that date is wrong. That should have
17 been the 24th. As you can see, there are two
18 23rds on that.

19 MR. BURCHFIELD: No wonder he lost.

20 BY MS. WEISSENBORN:

21 Q On October 24 at 4:00 he was
22 scheduled to be at a steering committee

1 meeting. We're assuming that is an NRSC
2 steering committee; is that correct?

3 A Steering committee meetings were
4 actually things that were handled by the
5 corporate affairs division and not us. And
6 while they were held at NRSC, they were not
7 NRSC meetings. In other words, it wasn't an
8 NRSC steering committee. It was a fund-raising
9 steering committee that many candidates created
10 among the people in Washington, and they would
11 have them.

12 That was one of the uses -- that
13 would be an example of one of the things we
14 would say we could do for you pre-primary.
15 "You may use our facility when you are in
16 Washington; you may make phone calls or hold
17 meetings here or whatever." And that's what
18 the steering committee meeting would be.

19 Q So it wasn't a committee that was
20 establishing NRSC policy?

21 A Oh, no.

22 Q It was others?

1 A No, it was like fund-raising. It was
2 a generic term, and it was a fund-raising
3 steering committee.

4 Q Did you often go to meetings of the
5 steering committees like this?

6 A On occasion.

7 Q Would you probably have been at this
8 one or do you remember being at this one?

9 A I don't remember, but I could have
10 been. I did it when I was asked to. I really
11 don't remember specifically this one.

12 Q So you don't remember who was on it?

13 A Oh, no.

14 Q What individuals were on it?

15 A No, I wouldn't have any idea, no.

16 Q The next page of the exhibit covers
17 the same period of time; that is a calendar.
18 Go back to Monday the 23rd at 9:30, there is an
19 "Interview with Mike Myers of The Hill at
20 NRSC." Is that, again, the usual kind of thing
21 that the NRSC does? Would you have arranged
22 this interview or --

1 A We could have. Sometimes when
2 candidates were coming to town, we would -- at
3 their request, if they wanted us to -- contact
4 The Hill or Hotline or Roll Call. Sometimes
5 they contacted them themselves. Sometimes they
6 needed a place to meet. But I don't know the
7 specifics of this one, but it was a typical
8 thing that would happen, yes.

9 Q Then the same thing the next day, at
10 11:30, "Meeting with Steve Hart." Do you know
11 who Steve Hart is?

12 A I do. I know Steve Hart, yes, I do.

13 Q Would that have been a reporter
14 situation?

15 A No, that was probably a fund-raising
16 situation. He's not a reporter.

17 Q Is that something that you probably
18 would have arranged?

19 A Probably not.

20 Q Again, using the facilities but --

21 A Yes, using the facilities, but not
22 the meeting.

1 Q Okay. Then, the next, "1:45, Meeting
2 with Ken Rudin of Hotline." Would that be the
3 same? Do you remember arranging that?

4 A I don't remember arranging that.
5 Again, it could have been something that we set
6 up the interview, or we just simply made
7 arrangements for the room to be used and they
8 set up the interview, just like with the other
9 situation. Yes, those were the typical ones we
10 would contact.

11 Q And then the very last part of this
12 is a newspaper article, and the reason I
13 included it is on the last column, the very
14 first line it talks about "two fund-raising
15 events in Washington. One is a 'meet and greet
16 luncheon' today sponsored by James McClure."

17 What do they mean by "meet and
18 greet," first of all; do you know?

19 A Yeah. Generally -- well, I say
20 generally what a meet and greet is -- I assume
21 that's what this was -- when a candidate was
22 running who had not held public office or

1 federal public office before and was therefore
2 unfamiliar with people in the Washington area
3 and members of the Senate and just the
4 Committee here, it was fairly typical for a
5 senator to sponsor a lunch where there was no
6 cost to come.

7 It was simply an opportunity to come
8 and meet the individual. They would generally
9 get up and talk and, you know, talk about their
10 candidacy and why they were running. And it
11 was really just sort of a "Hello, how are you,"
12 get to see what the person is like and provide
13 them an opportunity to meet some of the people
14 in Washington.

15 Q Is this the kind of thing your office
16 would do? Not necessarily this one; in general
17 would you do this kind of arranging?

18 A We didn't handle the meeting groups.
19 We would have probably set up the room for the
20 meet and greet, you know, if they, in fact, did
21 it at NRSC. I don't know that they did.

22 Q It doesn't really say, no.

1 A I don't really remember. But if they
2 did, we would have done that and put them in
3 contact with the caterer or whatever or gotten
4 our corporate affairs division to do that. But
5 we would not have, like, invited, handed out
6 invitations. The campaign would have done that
7 themselves.

8 MS. WEISSENBORN: I would like to
9 introduce another, Exhibit No. 5.

10 (Barnhart Deposition Exhibit
11 No. 5 was marked for
12 identification.)

13 BY MS. WEISSENBORN:

14 Q Do you recognize this document?

15 A I don't recognize it specifically,
16 but it appears it was an NRSC news release.

17 Q A news release talking about
18 potential media activities, and it's dated
19 Thursday, October 19, 1995. This copy was
20 apparently, as you can see up at the top, at
21 the very top line, faxed to La Donna Lee of
22 Eddie Mahe's company the same day that it was

1 released.

2 Was this a routine procedure, to send
3 out press releases like this to persons working
4 with campaigns, or why would she have been sent
5 this?

6 A It was routine, if we did a new
7 release that mentioned a state where there was
8 an active Senate race, to provide copies of the
9 new releases to the campaign or whoever the
10 campaign had designated as the person they
11 wanted to receive them, yes.

12 Q Do you remember discussing this news
13 release or the issues of it or the content of
14 it with Mr. Rehberg when he was in Washington,
15 right after this came out in October? We have
16 been looking at the schedule; he was here the
17 23rd and 24th and so forth.

18 A No, I don't. In fact, I don't really
19 remember the release, so no.

20 Q But do you remember discussing with
21 him a prospective ad campaign for 1996?

22 A No, absolutely not. I didn't. It's

1 not that I don't remember. I know that I
2 didn't.

3 Q Even if you didn't discuss the
4 prospective ad campaign, as such, do you
5 remember any discussions with Mr. Rehberg about
6 a campaign in opposition to Senator Baucus,
7 what kind of issues might be addressed in that
8 kind of discussion?

9 A As I recall, most of my discussions
10 with Dennis were about fund-raising and the
11 fact that he really needed to raise more money
12 than he had; that he needed to be focusing more
13 of his efforts on fund-raising. That was what
14 we spent most of our time talking about.

15 Q Now, I would like to go back to
16 Exhibit No. 4 just for a moment, speaking of
17 fund-raiser. Down at the very bottom of the
18 first page under Tuesday, October 23 at 5:30,
19 there was a PAC fund-raiser at the home of Cy
20 and Linda Jamison scheduled here.

21 Would that have been a function that
22 the NRSC would have been involved in? Did you

1 arrange that?

2 A No, I didn't. In fact, we had a
3 policy that we didn't do that.

4 Q "That" meaning?

5 A The policy that we operate under,
6 this was, again, a pre-primary situation, was
7 that if events were hosted at the NRSC; in
8 other words, not by us, but if they occurred at
9 the NRSC, people were allowed to attend them.
10 We didn't --

11 Q You mean your own people?

12 A Yeah, we didn't help get people
13 there. We just were allowed to attend. If
14 they were off of the NRSC property, then we
15 didn't go because, again, it got back to the
16 whole perception thing of being neutral in
17 primary or not being neutral in the primary.
18 So no, I didn't -- I would not have had
19 anything to do with this, nor would anyone at
20 Committee.

21 MS. WEISSENBORN: This probably is a
22 good time to break for lunch before we go on to

1 another date.

2 (Whereupon, at 12:30 p.m. a
3 luncheon recess was taken.)
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A F T E R N O O N S E S S I O N

(1:30 p.m.)

Whereupon,

JO ANNE B. BARNHART

was recalled as a witness and, having been
previously duly sworn, was examined and
testified further as follows:

EXAMINATION BY FEC COUNSEL CONTINUED

MS. WEISSENBORN: Back on the record.

Let's start with Exhibit No. 6.

(Barnhart Deposition Exhibit

No. 6 was marked for

identification.)

BY MS. WEISSENBORN:

Q Again, this is a calendar supplied by
Mr. Rehberg. So you wouldn't have seen it
before, I know, but the items that are still
visible all relate to NRSC contacts of some
kind or another.

I draw your attention down to 10:00
on Thursday, March 21, 1996. Do you remember
meeting with Mr. Rehberg on that day?

1 A I don't remember specifically that
2 day, but we did occasionally meet.

3 Q So this would be in the spring of
4 '96, in other words?

5 A I don't remember specifically, but it
6 could have happened, yeah.

7 Q Do you have any recollection of what
8 you might have been talking about with him?

9 A Again, I can't specifically remember
10 that meeting. Generally, when we met, he would
11 stop by and talk about how fund-raising was
12 going or where he was, about how he was going
13 around the state, just a general campaign
14 update kind of thing, very upbeat and positive.

15 Q Do you have any recollection of
16 discussing an upcoming advertising campaign
17 involving the issue ads we've talked about?

18 A I not only have no recollection, I'm
19 sure I didn't do that. This was -- again, on
20 the advice of counsel, I wouldn't have done
21 that.

22 Q Do you remember whether they were any

1 scripts that had already been prepared at that
2 point of potential issue ads?

3 A I don't remember specifically, but
4 there could have been.

5 Q But did you ever show him any at that
6 point or later?

7 A No, I didn't show him any scripts.

8 Q And I know some of this is
9 repetitious, but did you ever discuss potential
10 timing of the placement of such ads on stations
11 in Montana?

12 A No. Since I didn't discuss ads with
13 him, I wouldn't have discussed timing.

14 Q Okay. Did you ever hear about anyone
15 else at the NRSC discussing issue ads with
16 Mr. Rehberg?

17 A No. And I would like to say that I
18 had made it very clear to my staff that these
19 matters were not to be coordinated or
20 discussed, shared in any way with anyone, any
21 candidates or campaign, again, based on the
22 advice of my legal counsel.

1 And I have absolutely -- they knew I
2 really meant it, and I have absolutely no
3 reason to believe that they would have. They
4 were all honest, hard-working, serious people
5 and so, no.

6 Q In a broader sense, aside from the
7 question of the issue ads as such, do you ever
8 remember discussing potential campaign issues
9 with him that he was planning to focus on in
10 Montana, or that you would suggest to him?

11 A I don't remember anything
12 specifically, no.

13 Q Back on the exhibit, at 12:00 that
14 same day, on Thursday the 21st, it says,
15 "Fund-raising luncheon at the NRSC with GZ, CER
16 attending." Do you know who "GZ" would be or
17 "CER"?

18 A I have no idea.

19 Q Do you remember there being such an
20 event at NRSC?

21 A No, but there could have been. This
22 says there was. There probably was. But it

1 would have been one of those events that I
2 talked about before where we scheduled a room.
3 It was fairly typical for candidates to come in
4 and do it, so.

5 Q You probably said this before, but
6 did your office actually do the arranging and
7 who to invite and that kind of thing?

8 A We wouldn't have done that kind of
9 thing. We would have either made arrangements
10 ourselves to schedule the use of the room and
11 referred it to a caterer, or contacted
12 corporate affairs and have them do it. We
13 wouldn't have anything to do with invitations
14 or anything at that point, because this is a
15 pre-primary situation, and we didn't engage in
16 that kind of activity.

17 Q And then under that, at 1:30 it says,
18 "Senatorial committee one-on-ones." What does
19 that mean?

20 A You know, I don't know what that
21 means.

22 Q Okay.

1 A I don't know.

2 Q It's not a term of art, so to speak,
3 within the NRSC?

4 A No. Actually, generally, I think it
5 means meeting with one person at a time, but I
6 don't know what it means.

7 Q That didn't have a special meaning,
8 as far as you know?

9 A Oh, no.

10 MS. WEISSENBORN: I would like to
11 introduce No. 7, and let's do these two
12 together.

13 (Barnhart Deposition Exhibits
14 Nos. 7 and 8 were marked for
15 identification.)

16 BY MS. WEISSENBORN:

17 Q As an introduction to this phase of
18 the deposition, I have a series of press
19 releases of ads, and there's a separate
20 document package, copies of checks that you had
21 provided of authorization forms or sometimes
22 memorandum; sometimes one or the other.

1 And part of what I would like to do,
2 because I can't tell -- and we'll go into a
3 little bit more -- whether the check that I've
4 attached relates to the ads. Or as we go
5 along, if you can, if it makes sense, if they
6 go together -- maybe they don't. I'm not
7 saying that they do, okay?

8 In this case, No. 7 is an ad, press
9 release for an ad, that apparently began to run
10 on April 16, 1996, and an attachment. Do you
11 recognize this ad as something that actually
12 ran? Is that discussed in the --

13 A Again, let me say, and I'm not trying
14 to be difficult, I can't tell you that I
15 absolutely recognize this specific ad, but it
16 probably was an ad. I just don't remember all
17 the scripts and everything verbatim, but yeah,
18 it probably was.

19 Q So the subject matter and the format
20 and that sort of the thing?

21 A Yeah, just because it's basically the
22 way we lay things out, and it was Montana that

1 we're talking about. And so, yeah, it probably
2 was.

3 Q Okay. So assuming that this did, in
4 fact, run on April 16, why would that have been
5 the date for this particular ad, not the
6 specific date, but that period of time?

7 A Well, again, as I explained earlier,
8 we had an internal calendar that we looked at.
9 We looked at when votes were coming up, and I
10 don't remember the specific dates as these
11 dates but the next balanced budget --

12 Q In this case, term limits?

13 A -- or term limits or whatever was
14 scheduled for. But there were definite issues
15 that were on the calendar that were coming
16 before the Senate at some point in the future.
17 So that was really what it was about.

18 Q Okay. Were you involved in the
19 preparation of this particular ad campaign; do
20 you remember?

21 MR. BURCHFIELD: Object to form.

22 THE WITNESS: In terms of this

1 particular ad?

2 BY MS. WEISSENBORN:

3 Q Yes.

4 A I was involved in the preparation,
5 like I say, of an ad like this that ran. I
6 assume this is the ad, yes.

7 Q Who actually wrote the scripts of an
8 ad like this?

9 A For this particular ad or for the ads
10 that we did in Montana? It was a team
11 approach, basically.

12 Q But in-house?

13 A Oh, yes. Well, in-house we might
14 have had consultants sitting in working with
15 us, but it was done at NRSC, yes.

16 Q Again, I know this is repetitious,
17 but was this language shown to anyone
18 representing the Rehberg campaign?

19 MR. BURCHFIELD: Object. Asked and
20 answered, assuming that the question means
21 prior to the time the ad actually aired.

22 MS. WEISSENBORN: I do mean prior to

1 the time.

2 MR. BURCHFIELD: I think she has
3 consistently given you the answer to that
4 question.

5 Ms. Barnhart can answer it again.

6 THE WITNESS: No, it was not shown
7 prior to the time that it ran.

8 BY MS. WEISSENBORN:

9 Q Was it ever read to someone over the
10 phone or something like that as opposed to
11 being physically shown to them?

12 A Oh, to my knowledge, in no way was
13 this ad, the contents of this ad, shared with
14 the Rehberg campaign prior to its running. As
15 I explained, we had a very strict policy on
16 that; that was communicated to my staff, and I
17 oversaw this process and so, no.

18 Q And again, I know you have touched on
19 this before when you were talking about the
20 press release, the other, earlier one, the fax,
21 up at the top, it says that this was faxed to
22 La Donna Lee on the same day as it was

1 released. Would you just tell me the scenario?

2 A I think, as I mentioned before, we
3 had a policy that when we sent out press
4 releases that mentioned a state or a Senate
5 race was taking place, we would fax it to that
6 campaign person -- the person that campaigns
7 it. Normally, it was the campaign that
8 requested a specific person, and then that was
9 the person we sent it to.

10 Q Now, the second and third page, can
11 you tell me what that is?

12 A Uh-huh. This is the script of the ad
13 on the left-hand side, and on the right-hand
14 side, it is the information, the research that
15 verifies that that is, in fact, a correct
16 statement. This was something we felt was
17 important to do to show the veracity of the
18 script.

19 Q And apparently, given the fax
20 information up at the top that this went out to
21 the candidate or the committees with the press
22 release, you sent the whole package; correct?

1 A I assume that was the case. It says,
2 "See attached documentation"; so this is the
3 documentation that's referred to.

4 MR. BURCHFIELD: Objection to the
5 form of the question. I don't think you intend
6 this implication, but you might want to clarify
7 that the press releases did not go only to the
8 candidates.

9 THE WITNESS: Right.

10 MR. BURCHFIELD: But the question
11 might be read later by someone who wasn't here
12 that was the intent and the substance.

13 THE WITNESS: We had a blast-fax
14 capability at the committee. And when we put
15 out a press release like this, it would go out
16 to media, probably hundreds of hundreds of
17 media outlets across the country, as well as to
18 the campaign. So yes. Yes.

19 And I appreciate the clarification
20 because absolutely, yeah.

21 BY MS. WEISSENBORN:

22 Q So the backup went along to

1 everybody, then, this whole package?

2 A Yeah. It says, "See attached
3 documentation"; this is the documentation. So
4 the whole package would have gone to everybody
5 who got the release.

6 Q Fine. On the other package of
7 documents, No. 8, a check for \$32,800 for radio
8 buys, a check written on an account of the
9 National Republican Senatorial Committee dated
10 April 11, 1996; attached to it is a check
11 authorization form involving the same amount of
12 money.

13 Let's just take the authorization
14 form first. On the right side it says
15 "division," the political division. That would
16 have been your division; right?

17 A That's correct.

18 Q The "contact person, Greg Strimple."
19 Is it correct that he was the person, then?
20 Why was his name on there?

21 A His name would have been on there
22 because he was the person who talked to Multi

1 Media Services. He worked for me, and this was
2 part of the whole process of running ads.

3 Q Down in the middle where it says,
4 "Authorized for payment," over on the left,
5 "Division director," whose initials are those?

6 A I think those are Greg's initials.

7 Q So he had the authority to authorize
8 this kind of payment; is that correct?

9 A He had the authority as granted by
10 me. Although, I can't speak to this specific
11 document, if I were not in the office for some
12 reason, we talked on the phone or whatever and
13 I would say, "Okay, you can go ahead and sign
14 something so that something can move." But he
15 would have consulted with me.

16 Q And the next page is a memorandum
17 dated April 11, 1996, to Greg Strimple from
18 Dwight Sterling. Who is Dwight Sterling or who
19 was he at that time?

20 A He is a person that worked for Multi
21 Media. He's a time buyer.

22 Q This memorandum indicates in the

1 second sentence, "The schedules will air in
2 parts of four states: Iowa, Massachusetts,
3 Minnesota and Montana."

4 First of all, let me back up a
5 moment. Would you say that this payment in
6 part reflects the payment for this ad? Would
7 you know or can you tell?

8 A The way that I would determine that
9 would be by looking at the purchase order
10 number, and if there was a purchase order
11 number somewhere definitely tying the two
12 together.

13 Q Here, would it be this one
14 (indicating)?

15 A Yes.

16 Q The 21789?

17 A Yes.

18 Q And then this ad that we've been
19 looking at, would that be the one that is
20 discussed, as far as Montana is concerned, in
21 the memorandum?

22 A To be honest, I can't say

1 definitively that it is, because I don't see
2 anything here that identifies tying this ad
3 specifically to this purchase order. But this
4 is clearly for radio ads.

5 Q Do you remember doing four radio ads
6 in four states at this particular time; does
7 that ring a bell?

8 A I don't remember doing four ads in
9 four states.

10 Q So do you remember whether this
11 particular ad -- which the way it was written
12 here and what we have in front of us is for
13 Montana -- whether language comparable to this
14 but with, perhaps, the names of candidates
15 changed or the names of senators changed would
16 have been shown in the other three states?

17 MR. BURCHFIELD: Objection. Scope
18 and relevance to this proceeding.

19 MS. WEISSENBERG: The relevance is
20 that we are attempting to determine whether
21 Montana was a program unto itself or whether it
22 was treated differently in that sense, or

1 whether it was treated the same as other
2 places.

3 MR. BURCHFIELD: Whether there was a
4 similar advertisement in Iowa, Massachusetts,
5 or Minnesota doesn't really bear upon either of
6 the two issues that are set out in the factual
7 and legal analysis concerning the Montana ads.

8 Indeed, I think it makes pretty clear
9 that the only two issues in this MUR are
10 whether the ads -- I think the Commission uses
11 the term "electioneering," and we will argue
12 along that here; and second, whether they were
13 coordinated with the candidate in Montana.

14 I just don't see how an inquiry about
15 the content, the timing, the costs, the
16 personnel involved in Iowa, Minnesota, and
17 Massachusetts ads are going to help shed any
18 light on either of those two issues.

19 MS. WEISSENBERN: Are you instructing
20 your client not to answer that?

21 MR. BURCHFIELD: Yes, I am.

22 BY MS. WEISSENBERN:

1 Q Did Multi Media Services handle all
2 of your media placement?

3 MR. BURCHFIELD: But let me say, as I
4 indicated earlier, if you can give me an
5 explanation of why this is pertinent to this
6 investigation, I'll consider it.

7 MS. WEISSENBORN: I just did.

8 MR. BURCHFIELD: And I disagree with
9 that explanation, which, as I understand it,
10 was that you were trying to see if there were
11 similar ads being run in other states?

12 MS. WEISSENBORN: No. It was whether
13 Montana was treated as an entity unto itself or
14 whether it was a part of a larger program.

15 MR. BURCHFIELD: But I don't
16 understand how that bears on either of the two
17 issues.

18 MS. WEISSENBORN: Okay. I would say
19 it does.

20 MR. BURCHFIELD: Okay.

21 BY MS. WEISSENBORN:

22 Q Was Multi Media Services Corporation

1 your media placement firm, I guess, for all of
2 your ads at this point?

3 A I don't really remember if they were
4 for all the ads or not. I know they did
5 place -- I know they did place some of the ads
6 for Montana. I don't remember if we did it
7 all.

8 Q It is generally true that prepayment
9 is always required for placing radio and
10 television ads?

11 A Yes, it's true.

12 Q So any check that was written after
13 the date of an ad could not be related to that
14 ad, probably?

15 A Probably not.

16 Q Let's see. So to reiterate what you
17 said a minute ago, the only way that we would
18 be able to tell that this ad was paid for with
19 this check was if there was some indication of
20 a mutual purchase order, and there isn't here
21 (indicating).

22 Who in your organization would know

1 now? Is there anybody there now that would
2 have information as to what check paid for
3 what?

4 A They would have the same information
5 that we're looking at now. The script wouldn't
6 have attached itself all the way through the
7 process. So I think I would -- I think what
8 I'm saying is if anyone would know, I know.

9 MS. WEISSENBORN: Let's try another
10 one. How about Nos. 9 and 10.

11 (Barnhart Deposition Exhibits
12 Nos. 9 and 10 were marked for
13 identification.)

14 BY MS. WEISSENBORN:

15 Q Do you recall this ad that is
16 represented in this news release that began to
17 air on April 12, 1996, in Montana?

18 A Well, as I think I mentioned before,
19 I definitely remember running an ad about the
20 Balanced Budget Act, and this may well be.
21 Again, I'm not trying to be difficult. I just
22 can't remember specifically scripts because

1 there were drafts of scripts and things. So
2 this is probably that ad.

3 Q But it is safe to say that if it got
4 to a point of sending out a news release, that
5 probably meant that ad itself did run?

6 A Yeah. If you're asking me if I
7 remember --

8 Q Right.

9 A I'm not trying to be difficult. All
10 I'm saying is I can't remember, like, the
11 specific things, but it is attached to this
12 press release. We ran an ad on the balanced
13 budget, so this is probably it.

14 I mean, I'm accepting the document as
15 the actual attachment to the press release.
16 I'm just saying that in point of fact, I can't
17 remember every single script that ran. That's
18 the only point I wanted to clarify.

19 Q Right. Were you involved in the
20 creation of this ad?

21 A Yes, I was, uh-huh. Again, on the
22 balanced budget ad, you know, so.

1 Q Now, I know this is repetitious, but
2 would La Donna Lee have seen this ad prior to
3 its going out, being aired?

4 MR. BURCHFIELD: Objection. Asked
5 and answered several times.

6 You can answer it again.

7 MS. BUMGARNER: I don't think it is
8 at all.

9 MR. BURCHFIELD: But you've asked
10 generally the same question. I mean, it's like
11 saying, "Okay, this is a check for \$32,637.50
12 and did the 50 cents go to the ad; did the \$7
13 go to the ad; did the \$30 go to the ad; did the
14 \$600 go to the ad."

15 I mean, you don't have to ask when
16 there has been no equivocation in the answer.
17 You don't have to ask the question every single
18 way in every single circumstance. There has
19 been an unequivocal statement at least five
20 times today that they did not show the ads in
21 advance. And I just think it is repetitious
22 and a waste of time, but it's your deposition.

1 I've made my objection. So go ahead.

2 BY MS. WEISSENBORN:

3 Q The answer is?

4 A I'm sorry, the question again?

5 Q Whether or not La Donna Lee would
6 have seen this?

7 A No, she wouldn't have.

8 Q And looking at the check, which is
9 Exhibit No. 10, can you tell from this and the
10 memorandum that is attached to the check
11 whether they related to the ad in Exhibit
12 No. 9?

13 A Well, again, as I said before,
14 because of the fact there's no purchase order
15 attached for anything, I can't say definitely.
16 But obviously, this memo speaks about a radio
17 ad, and the time frame is April 25 to May 3.
18 This was issued on April 22. I would assume
19 that.

20 Q Do you keep purchase orders or
21 invoices, or I guess this memorandum was
22 intended to serve as that?

1 A Did I keep them?

2 Q Yes, or did NRSC, yes.

3 A No. That was the way of moving paper
4 through the agency and showing that the
5 appropriate level person had signed out on the
6 expenditure of either purchasing or expending
7 funds to purchase something, or whatever, like
8 time in this case. So no, there was no reason
9 for me to keep them.

10 Q In this case we're missing the
11 authorization. I guess this served, the stamp,
12 right, as the same thing (indicating)?

13 A What happened sometimes if a PO
14 didn't go through at the earlier -- we would
15 deal with it. That was the way accounting --
16 if there was a nonpursue attached, they would
17 send it back up for authorization that way.

18 Q Do you have any other way of linking
19 a payment with a particular ad or with
20 particular language in an ad?

21 A It wasn't really felt necessary to do
22 that. I didn't. I don't know if anyone else

1 did. I didn't, so I don't think so.

2 MS. WEISSENBORN: Let's take a break
3 for about just five minutes.

4 (Recess)

5 (Barnhart Deposition Exhibits
6 Nos. 11 through 20 were marked
7 for identification.)

8 BY MS. WEISSENBORN:

9 Q Looking at just the scripts, which
10 would be Nos. 11, 13, 14, 15, 16, and 19, those
11 exhibits, I'm going to ask my repetitious
12 question one more time and that is: Were
13 Mr. Rehberg or any of his representatives,
14 either staff members or consultants, shown the
15 scripts of these ads prior to their being
16 aired?

17 A No.

18 Q For those for which there is not a
19 press release attached, for example, No. 14, do
20 you remember whether there was an ad that
21 actually went out on the air with that content?

22 A I really don't remember. I do

1 remember this draft. I don't remember if we
2 actually ran it or not.

3 Q Looking at the checks and their
4 backup material, which would be Exhibits
5 Nos. 12, 17, 18, and 20, based upon whether
6 it's the amount of the check or whatever
7 indication you might have, can you link any of
8 those checks with particular ads that are in
9 front of us, where we have the texts in front
10 of us?

11 A I can't link it with a particular ad
12 other than to the extent we're talking about
13 television and some 30-second script. But in
14 terms of saying it's that particular ad, I
15 couldn't do that for sure.

16 Q One more visit that Mr. Rehberg,
17 apparently, made to Washington, I wanted to ask
18 you about.

19 MS. WEISSENBORN: This is be No. 21.
20 (Barnhart Deposition Exhibit
21 No. 21 was marked for
22 identification.)

1 BY MS. WEISSENBORN:

2 Q Well, this was a document you may
3 have seen because it was an exhibit to the
4 complaint in this matter. It's apparently a
5 transcript of his appearance on a radio show on
6 May 1 in which he talks about having flown to
7 Washington, and down at the last sentence, on
8 meeting with the National Republican Senatorial
9 Committee. Do you remember a meeting with him
10 on May 1, 1996?

11 A I don't remember a meeting on that
12 specific day.

13 Q Do you remember one really close to
14 that or around that point?

15 A It's very difficult from a time
16 perspective to say they were on a date or not.
17 I do remember Dennis stopping by my office a
18 couple of times in the pre-primary time period
19 just to say, "Hi, I was in town; things are
20 going great," that kind of thing. Beyond that,
21 I can't tell you exactly what day it was or
22 anything like that, okay.

1 Q Or what you talked about?

2 A Other than just he was always very --
3 he's a really positive, upbeat kid. He was
4 always telling me how well things were going.

5 Q Okay. Besides the meetings that
6 we've shown you as listed on Mr. Rehberg's
7 calendars and the radio transcript, do you
8 remember any other meetings with him, to begin
9 with?

10 A Other than, as I have just described
11 to you, the kind of stop-by thing and that,
12 literally, he would stand out my office and
13 say, "Hi, I was in town." And the ones we
14 described earlier; the one where I have my
15 whole staff there.

16 Q I was including that as one that was
17 on his calender. But anything that did not
18 appear on his calendar or that kind of thing we
19 talked about?

20 A Other than I just described, no, I
21 don't.

22 Q Do you remember any other meetings

1 without him with any member of his staff,
2 Mr. Pieper or anyone else on his committee
3 staff that we haven't talked about?

4 A I do remember meeting with La Donna
5 Lee.

6 Q When would that have been, about; do
7 you remember?

8 A Probably the fall of '95 or something
9 like that. Again, I'm talking in this time
10 period. We had lunch.

11 Q Do you remember anything about what
12 you discussed?

13 A The same kinds of things. She was a
14 consultant to the campaign. She would tell me
15 what a great candidate Dennis was, and just
16 general political talk like that. It was one
17 of those sort of friendly lunches, you know,
18 sort of.

19 Q Did you ever do something like that
20 with Eddie Mahe?

21 A No, I didn't.

22 Q But you said earlier that La Donna

1 was your primary contact?

2 A Yes, she was.

3 Q Do you remember hearing that either
4 Mr. Rehberg or any of his representatives,
5 including his consultants, had had meetings
6 with anyone else at the NRSC that we haven't
7 talked about? Aside from the one where we went
8 through with the list of people that were there
9 and so forth, do you remember hearing that he
10 was talking with anybody else, he or any of his
11 reps?

12 A No, I don't.

13 Q I would like to sort of summarize
14 what I believe we've heard from you today as
15 far as information given to candidates or not
16 given. So see if this is a correct statement:
17 That you have testified that at no time was
18 Mr. Rehberg apprised of the fact that an
19 advertisement, an issue ad, was going to be run
20 prior to its being run; is that correct?

21 A That's correct.

22 Q And the same would hold true with his

1 consultants, that at no time were they apprised
2 that an ad was going to be run prior to its
3 being run?

4 A That's correct.

5 Q I want to clarify for the record,
6 we're talking about the ads that have been the
7 subject of this, the ones that the NRSC has
8 characterized as "issue ads." I'm not
9 characterizing them as that, but that is what
10 you have said that they are; right?

11 A I'm sorry. I'm not understanding the
12 question.

13 MS. BUMGARNER: It's just a
14 clarification.

15 BY MS. WEISSENBORN:

16 Q Also, I just want to clarify that you
17 said that you have no calendars or logs or
18 other information citing meetings with the
19 Rehberg campaign, Mr. Rehberg, or any of his
20 representatives; you did not retain such
21 information?

22 A That is correct. I didn't retain

1 anything, right.

2 MS. WEISSENBORN: Do you have any
3 questions you want to ask?

4 MR. BURCHFIELD: No. Thank you for
5 being so expeditious.

6 MS. WEISSENBORN: It's our policy to
7 not close depositions, but to adjourn them just
8 in case we ever might want to ask you back.
9 The chances are very slim.

10 But just in case, I'm sure your
11 attorney will talk to you about having a chance
12 to go to the reporter's office and read the
13 deposition if you want to.

14 MR. BURCHFIELD: We would like to
15 read.

16 (Whereupon, at 2:24 p.m. the
17 deposition of JO ANNE B.
18 BARNHART was adjourned.)

19 * * * * *

20

21

22

I, SHARON McKINNON, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotypy and thereafter reduced to print under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, furthermore, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

Sharon McKinnon

Notary Public in and for the
District of Columbia

My Commission Expires:
June 30, 2000

CONFIDENTIALITY ADVISEMENT

Since this information is being sought as part of an investigation being conducted by the Federal Election Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation. You are advised that no such consent has been given in this case.

J. Anne B. Barnhart
(Signature)

11/7/97
(Date)

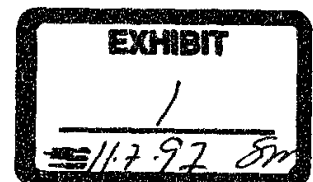
Jc Anne B Barnhart
(Print Full Name)

5-26-50
(Date of Birth)

221-38 3687
(Social Security Number)

703-920-0821
(Telephone Number)

4609 S. 5th Street, Arlington, VA 22204
(Address including Street, City, State, and Zip Code)



DRAFT NRSC RADIO:60 - "1974-BAUCUS"

Music up and under

ANNCR:

1974.

The top movie is "Godfather Part II"

(SFX under Anncr. = Machine gun fire)

"Streaking," becomes a national fad.

(SFX under Anncr. = teenager yelling/running outdoors)

Max Baucus goes to Washington, and our national debt is \$484 billion.

A lot's changed in 21 years - for example, Max Baucus's salary has more than tripled, from \$42,000 to \$133,000 a year.

And the national debt has skyrocketed to \$5 trillion.

What have we gotten from Baucus's 21 long liberal years?

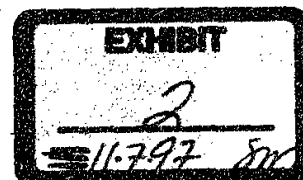
More taxes and more debt.

Liberal Baucus voted for five of the largest tax increases in American history. In one vote alone, he increased taxes on Montana families by \$2600 a year.

Baucus even voted to raise taxes on social security, small businesses, and gasoline.

Call liberal Max Baucus. Tell him to balance the budget. Tell him he was wrong to raise our taxes and spend us into debt. Tell him to vote for the majority's plan to balance the budget.

Paid for by the National Republican Senatorial Committee



Denny Rehberg

Sunday ~ July 16th

9:00 am

[REDACTED]

5:30 pm

[REDACTED]

No y

EXHIBIT
3
5/12/97 810

Denny Rehberg

Monday - July 17th

11:00 am -

12:30 pm -

2:00 pm -

3:00 pm -

3:30 pm -

5:30 pm - Meeting with Senator Alfonse D'Amato
520 Hart Senate Building
(ph)202-224-6542 (Hart)
Contact: Beth Walker (@NRSC - (ph)202-675-6036)

NO

Denny Rehberg

Tuesday ~ July 18th

8:00 am -



9:00 am -

NRSC

Meeting with John Heubusch (Executive Director)

425 2nd St., NE

(ph) 202-675-6000

Contact: Wes Anderson

20002

9:15 am -

Meeting w/ Wes Anderson (MT Rep, Coalitions Director)

Ed Rahall (PAC Director)

Gordon Hensley (Communications)

JoAnn Barnhardt (Political Services Director)

Greg Striple (Polling)

Precilla Russo (Financial Services)

at NRSC - for presentation on Op-research

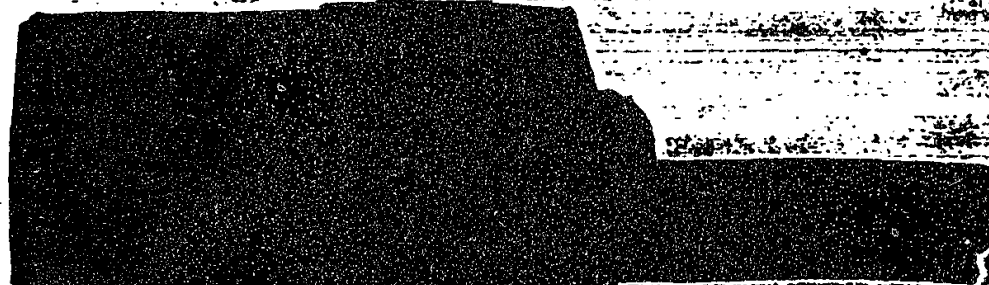
425 2nd St., NE

(ph) 202-675-6000

Contact: Wes Anderson

NO

11:15 am -



Rehberg Schedule

SATURDAY - OCTOBER 21

9:00am - [REDACTED]

SUNDAY - OCTOBER 22

6:00pm [REDACTED]

MONDAY - OCTOBER 23

9:30am - 10:00am [REDACTED]

1:15pm - 1:50pm [REDACTED]

2:00pm - 2:30pm [REDACTED]

2:30pm - 3:00pm
Builders [REDACTED]

6:00pm - 7:00pm [REDACTED]

TUESDAY - OCTOBER 23

9:30am - 10:00am [REDACTED]

10:30am [REDACTED]

12:00pm - 1:30pm [REDACTED]

1:45pm - 2:30pm [REDACTED]

3:00pm [REDACTED]

4:00pm - 5:00pm Steering Committee Meeting (Provide list tomorrow)

5:30pm - 7:30pm PAC Fundraiser @ Cy and Linda Jamison's

EXHIBIT

4

11792 sm

Oct 23 - 29, 1995

October 1995						
S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

NOVEMBER						
S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

23 Monday

24 Tuesday

25 Wednesday

■ (9:30-10:00) DR interview w/ Mike Myers of The Hill @ NRSC (no attend)

■ (11:30a-11:50a) DR meet w/ Steve Hart @ NRSC (G2)

■ (12:00-2:30) DR w/ Ken Rudin of Hotline @ NRSC (no attend)

■ (5:00p-5:30p) DR St Comm mtr @ NRSC (G2)

26 Thursday

27 Friday

28 Saturday

29 Sunday

G2 Hunting-South Dakota

Missoulian

P. 6/6

MISSOULA, MONTANA

OCTOBER 21, 1996

20/2

Double duty: ³² The lieutenant governor visits D.C. to attend a conference and raise funds for his Senate bid

By CHARLES S. JOHNSON
Missoulian State Bureau

HELENA - Republican Lt. Gov. Dennis Rehberg is in Washington, D.C., early this week attending a national business conference and raising money for his 1996 campaign for the U.S. Senate seat held by Democrat Max Baucus.

Rehberg said leaders of the National Federation of Independent Business personally invited him to attend the meeting because of what he said is Baucus' poor record in supporting issues important to small business. The federation has more than 9,000 members in Montana.

The trip to Washington is being paid for entirely by his campaign and himself, Rehberg said.

As an elected official, Rehberg has no vacation time. But as lieutenant governor, Rehberg said he has put in plenty of 50- and 60-hour weeks and worked lots of weekends, so he sees no problem with his making the trip, despite Democratic Party criticism.

"No body has ever accused Dennis Rehberg of not putting in a day's work and a day's pay," he said. "People are getting their money's worth from this lieutenant governor."

As for Democrats' criticism of him conducting campaign business on work days, Rehberg said, "I never said I wasn't going to spend time on this campaign, any more than Max Baucus said he wasn't going to spend time on the campaign."

Rehberg said he will campaign while still putting in the hours as lieutenant governor, and asked whether Baucus would make a commitment he will not campaign between now and 1996.

After he announced his candidacy in Kalispell Jan. 23, Rehberg told the Missoulian State Bureau he would confine his campaigning to off hours, on nights and weekends, and would separate the duties and the expenses. He said then he hopes Baucus will do the same.

State Democratic Chairman Kelly Adity criticized Rehberg, saying the lieutenant governor "is constantly breaking his promise to Montanans not to campaign when he's supposed to be doing the job they elected him to do."

Rehberg will be honored at two fund-raising



Rehberg

'I never said I wasn't going to spend time on this campaign, any more than Max Baucus said he wasn't going to spend time on the campaign.'

-Lt. Gov. Dennis Rehberg

events in Washington. One is a "meet and greet luncheon" today sponsored by James McClure, former Republican senator from Idaho, and three other people concerned with mining issues, according to Rehberg. No price for the event was listed.

The other is a reception tonight at the Washington home of Cy Jamison, an unsuccessful candidate for Congress in Montana last year. Sponsoring the event are Sen. Conrad Burns, R-Mont., and four other Republican senators from neighboring states. Tickets cost \$500 for political action committees or \$250 for individuals.



NRSC NEWS '96

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Chairman, Senator Alfonse D'Amato

FOR IMMEDIATE RELEASE:
THURSDAY, OCTOBER 19, 1995
NRSC95/165

CONTACT: NRSC PRESS OFFICE
NANCY IVES
202/675-6006

NRSC GATHERING VIDEO, AUDIO FOOTAGE OF CLINTON TAX COMMENTS GOP SENATE CAMPAIGN COMMITTEE PREPARING TO USE CLINTON "TAXED TOO MUCH" COMMENT IN 1996 SENATE RACES

Washington, DC -- The National Republican Senatorial Committee is today gathering video and audio footage of the President's "raised taxes too much" speech in Houston for use in the 1996 Senate campaigns.

"When President Clinton admitted he 'raised taxes too much', he left his tax increase supporters in the U.S. Senate twisting in the political wind," said John Heubusch, Executive Director of the National Republican Senatorial Committee. "We plan on letting voters know their Senator supported the Clinton tax increase and, that now, the President said the tax increase was too big."

Possible ad targets include Senators Max Baucus/MT, Paul Wellstone/MN, Carl Levin/MI, John Kerry/MA, Joe Biden/DE and John Rockefeller/WV.

In addition, those in the House of Representatives who backed the Clinton tax increase -- and who are now running for the U.S. Senate -- are also possible ad targets. They include liberal Representatives Bob Torricelli/NJ, Richard Durbin/IL, Jack Reed/RI and Tim Johnson/SD.

"The Clinton admission that he raised taxes too much has undermined all of the liberals who supported the record-size tax increase," said Heubusch. "We will ensure that voters know their Democrat Senator and Democrat Senate candidate 'raised taxes too much'. This is a great issue for the GOP because voters always suspected it was true -- and now the President himself has confirmed it."

EXHIBIT

5

11797 8m

Mar 18 - 24, 1996

March 1996						
S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

April 1996						
S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

18 Monday	19 Tuesday	20 Wednesday
[REDACTED]	[REDACTED]	[REDACTED]
21 Thursday	22 Friday	23 Saturday
<ul style="list-style-type: none"> [REDACTED] [REDACTED] [10:00a-11:15a]DR NRSC meetings @ NRSC [REDACTED] [11:45a-12:00p]DR mtg w/Ken Carroll of NAR @ NRSC [REDACTED] [REDACTED] [12:00p-1:30p]DR fundraising luncheon @ NRSC (GZ, CER attend) [1:30p-4:45p]DR Senatorial Committee one-on-one's, etc. (all handled by Mike Propper) [REDACTED] 	[REDACTED]	[REDACTED]
		24 Sunday
		[REDACTED]

EXHIBIT
6.
11.7.97

**NRSC NEWS '96****NATIONAL REPUBLICAN SENATORIAL COMMITTEE**

Chairman, Senator Alfonse D'Amato

FOR IMMEDIATE RELEASE:
TUESDAY, APRIL 16, 1996
NRSC96/81CONTACT: NRSC PRESS OFFICE
202/675-6006**NEW GOP ADS: BAUCUS SHOULD
HEED MONTANANS
ON TERM LIMITS****NRSC COMMENCES MONTANA RADIO CAMPAIGN URGING -
BAUCUS TO VOTE FOR TERM LIMITS
WHEN MEASURE COMES BEFORE SENATE**

Washington, DC - The National Republican Senatorial Committee today commenced a Montana radio campaign urging Senator Max Baucus to heed the wishes of Montanans by voting to support term limits when the measure is considered on the floor of the United States Senate.

The following sixty-second radio spot, produced for the NRSC by River Bank Inc., will air in markets throughout the state of Montana:

"Liberal Max Baucus voted to raise his own pay, then voted to raise our taxes. He was wrong. While working families are having a tough time making ends meet here in Montana, Max Baucus is back in Washington giving himself a big payraise, then voting to raise our taxes.

"Max Baucus increased his pay by more than \$23,000, then increased our taxes by more than \$2,600 per family. That's an outrage. Pay raises... higher taxes. That's not Montana - but it is Max Baucus.

"Soon the Senate will vote on term limits -- and the people of Montana support it. But not Max Baucus. In fact, he's already opposed term limits. It's just what you would expect from a Senator who's been in Washington for twenty-one long, liberal years.

"Call liberal Max Baucus. Tell him he was wrong to vote himself a big payraise, then vote to raise our taxes. Tell him it's time to vote for term limits."

See Attached Documentation

EXHIBIT**7****11.7.97**

<p>"...Baucus voted to raise his own pay. ..."</p>	<ul style="list-style-type: none"> Baucus voted for the amendment to raise senators' pay from \$101,900 to \$125,100. (CQ Vote #133: Adopted 53-45: R 25-18; D 28-27, July 17, 1991.)
<p>"...then voted to raise our taxes."</p>	<ul style="list-style-type: none"> Baucus voted for passage of the Clinton tax Increase Bill bill. (CQ Vote #190: Passed 50-49: R 0-43; D 49-6, with Vice President Al Gore casting a "yea" vote, June 25, 1993.) Baucus voted for adoption of the conference report. (CQ Vote #247: Adopted 51-50: R 0-44; D 50-6, with Vice President Al Gore casting a "yea" vote. Aug. 6, 1993.)
<p>"Max Baucus increased his pay by more than \$23,000..."</p>	<ul style="list-style-type: none"> Baucus voted for the amendment to raise senators' pay from \$101,900 to \$125,100. (CQ Vote #133: Adopted 53-45: R 25-18; D 28-27, July 17, 1991.)
<p>"...then increased our taxes by more than \$2,600 a family."</p>	<ul style="list-style-type: none"> The Heritage Foundation, in an April 7, 1994, study entitled "The State and District Impact of The Clinton Tax Increase," calculated that the 1993 Clinton/Baucus tax bill will cost Montana's taxpayers \$541,779,082 over five years, or \$668.04 for every man, woman and child in Montana. (family of four) $\\$668.04 \times 4 = \\$2,672.16$
<p>"Soon the Senate will vote on term limits. And the people of Montana support it.</p>	<p>"The margin of support for the 14 initiatives this year demonstrate the political potency of term limits: ... Montana, 67 [percent]; ..." (Insight Magazine, 11/30/92)</p>

"In fact, he's [Baucus] has opposed term limits."

- "But Baucus said Montana already had term limits before the [term limits] initiative: 'It's called voting.'" (The Associated Press, 8/23/93)
- Baucus voted for the motion to table (kill) amendment to limit terms of successful Senate candidates to two consecutive terms if they received public financing. (CQ Vote #69: Motion agreed to 68-30: R 12-30; D 56-0, May 22, 1991.)
- Baucus voted for the motion to table (kill) the amendment to impose term limits on candidates who receive public financing of six House terms and two Senate terms. Under the amendment, if an individual decided to run for an additional term, the individual would be required to repay all public financing previously received. (CQ Vote #128: Motion agreed to 57-39: R 6-36; D 51-3 May 26, 1993.)
- Baucus has also failed to cosponsor any of the 21 term limit initiatives that have been introduced in the Senate since 1979.

Request
#1

3151

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE
425 SECOND STREET NE
WASHINGTON, DC 20002-4907

SIGNET BANK
ACH REF ID: 0000378
WASH, DC

92-5031464
500

APRIL 11 19 96

PAY ***THIRTY TWO THOUSAND EIGHT HUNDRED AND 00/100*****DOLLARS \$ **32,800.50**

TO
THE
ORDER
OF

MULTI MEDIA SERVICES CORP.
915 KING ST., 2ND FLOOR
ALEXANDRIA, VA 22314

NOT NEGOTIABLE

⑈00003151⑈ ⑆056004089⑆ 651⑈7172927⑈

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

DELUXE - FORM W-3 V-2

DATE	DESCRIPTION	AMOUNT
04/11/96	RADIO BUYS	32,800.50



NRSC4378 001

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

CHECK AUTHORIZATION FORM

Vendor Name & Address:

Multi Media Services Corp.

Division: Political

915 King St., 2nd Floor

Contact Person: Greg Strimple

Alexandria, VA 22314

Date: 4-11-96

(703) 739-2160

Due Date: 4-11-96

Telephone No.: ↓

P.C. Number: 21789

Amount: \$ 32,800.50

Account No.

Purpose: radio buys

The amount should be expensed to the 01-7815-000

line(s) on my budget

☐ THIS AMOUNT IS IN BUDGET

line(s) on my budget

AUTHORIZED FOR PAYMENT

OK
DIVISION DIRECTOR

OK
COMPTROLLER

STAFF SECRETARY

EXECUTIVE DIRECTOR

FOR ACCOUNTING PURPOSES ONLY

☐ P.O. (FULL PAYMENT)

☐ P.O. (PARTIAL PAYMENT)

VENDOR #:

☐ ENTERED MANUAL CHECK

Invoice #	Inv. Date	Inv. Total	G/L Code	FEC Code	Amount	PO #
TOTAL						

☐ MAIL TO VENDOR

NRSC4378 002

MEMORANDUM

SENT VIA FAX

TO: GREG STRIMPLE
FROM: DWIGHT STERLING
DATE: APRIL 11, 1996
RE: MEDIA SCHEDULE COSTS - RADIO IN FOUR STATES

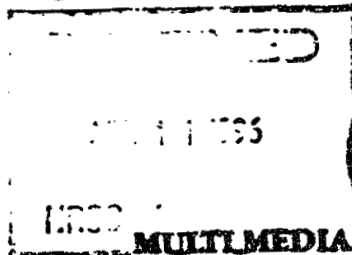
The following is a summary of costs for radio schedules in four states for the National Republican Senatorial Committee. The schedules will air in parts of four states: Iowa, Massachusetts, Minnesota and Montana. The schedules will air for the first part of the four part radio schedule, from Monday, April 15 thru Wednesday, April 24.

The total cost for the eight day schedules is \$32,800.50. Broken down by state, the costs are:

<u>State</u>	<u>Budget</u>	<u>Comments</u>
Iowa	\$ 9,873.00	Des Moines strongest, then Sioux City and Mason City.
Massachusetts	\$ 9,860.00	Worcester strongest, with a lighter schedule in New Bedford-Fall River
Minnesota	\$ 3,412.50	Duluth
Montana	\$ 9,655.00	Strong in Billings and Great Falls, and lighter in Missoula and Helena
TOTAL	\$ 32,800.50	

A breakdown by radio station of the costs in each state is attached. If you have any questions, please call me at (703) 739-2160.

/ds



MULTIMEDIA SERVICES CORPORATION

915 KING STREET, 2ND FLOOR • ALEXANDRIA, VIRGINIA 22314 • (703) 739-2160

P.O. # 21789

Budget Code: _____

Approved: 

Approved: _____

NRSC4378 003



NRSC NEWS '96

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Chairman, Senator Alfonse D'Amato

**FOR IMMEDIATE RELEASE:
THURSDAY, APRIL 25, 1996
NRSC96/98**

**CONTACT: NRSC PRESS OFFICE
202/675-6006**

GOP ADS: BAUCUS SHOULD BACK BALANCED BUDGET ON SENATE FLOOR

**NRSC COMMENCES MONTANA RADIO CAMPAIGN OUTLINING
BAUCUS LIBERAL RECORD OF TAXING AND SPENDING**

Washington, DC – The following sixty-second radio spot, produced for the NRSC by River Bank Inc., will begin airing in markets today throughout the state of Montana:

Annor.

You already know that liberal Max Baucus voted to raise his own pay by \$23,000 then voted to raise your taxes by more than \$2,600 a family.

But did you know that in the 21 long liberal years that Baucus has been in Washington, our debt skyrocketed to \$5 trillion.

It's a fact

And still liberal Max Baucus refuses to consistently vote for a real balanced budget.

Instead, he's voted to spend billions more on wasteful government spending.

That's right. Billions more

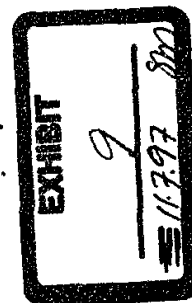
Liberal Max Baucus even voted to spend our taxdollars to pay for an alpine slide in Puerto Rico and a casino in Connecticut.

That's not Montana. But it is Max Baucus.

Call liberal Max Baucus at (800) 332-6106. Tell him to stop wasting our hard earned money. Tell him to vote for Congress' balanced budget plan.

Paid for by the National Republican Senatorial Committee.

See Attached 1 Page Documentation



AD TEXT

BAUCUS RECORD

<p>Baucus voted to raise his own pay by \$23,000.</p> <p>Baucus voted for the 1993 Clinton tax bill which raised taxes \$2,600 for a family of four in Montana.</p>	<p>Baucus voted for the amendment to raise senators' pay from \$101,900 to \$125,100, ban senators' honoraria and limit outside earned income to 15 percent of a senator's base pay. (CQ Vote #133: Adopted 53-45: R 25-18; D 28-27, July 17, 1991)</p> <p>Baucus voted for passage and adoption of the 1993 Clinton tax bill (CQ Votes #190, #247, 1993) Per capita impact of the 1993 Clinton tax bill on Montana was \$668.04. Multiplied by four equals \$2,672.16. ("The State and District Impact of the Clinton Tax Increase," Heritage Foundation, 4/7/94)</p>
<p>Baucus has been in Washington 21 years.</p> <p>While in office the national debt skyrocketed to \$5 trillion</p>	<p>Baucus was elected to federal office in 1975. He has spent over 21 years in Washington. (The Almanac of American Politics, 1996)</p> <p>The national debt as of Wednesday, April 17, 1996, was \$5,146,356,518,536.99. (The Washington Times, 4/19/96)</p>
<p>Baucus refuses to vote for a balanced budget.</p>	<p>Baucus voted against both passage and the conference report of FY 1996, a bill to balance the budget by 2002. (CQ Vote #556: Passed 52-47: R 52-1; D 0-46, Oct. 28, 1995) (CQ Vote #584: Motion agreed to 52-47: R 52-1; D 0-46, Nov. 17, 1995)</p> <p>Baucus voted three times for measures which expressed a desire for a goal of balancing the federal budget. (CQ Vote #371: Adopted 61-31: R 39-9; D 22-22, Dec. 11, 1985); (CQ Vote #581: Passed 60-37: R 53-0; D 7-37, Nov. 16, 1995); (CQ Vote #611: Passed 94-0: R 49-0; D 45-0, Dec. 21, 1995)</p>

<p>Baucus refuses to vote for a balanced budget.</p>	<p>Balanced Budget Constitutional Amendment</p> <p>Although Max Baucus' rhetoric promotes reducing the deficit, his record on the balanced budget amendment does not. Baucus has voted against the balanced budget amendment 10 times out of 13 occasions. The following three votes are considered to be the benchmark votes on the balanced budget amendment. Baucus voted against it in 1986 and 1994, then flip-flopped and voted for it in 1995. (CQ Vote #45: Rejected 66-34: R 43-10; D 23-24, March 25, 1986); (CQ Vote #48: Rejected 63-37: R 41-3; D 22-34, March 1, 1994); (CQ Vote #98: Rejected 65-35: R 51-2; D 14-33, March 2, 1995)</p>
<p>Baucus has voted to spend billions on wasteful government spending.</p>	<p>The net total of legislation Baucus voted for in the 103rd Congress was: "\$54,213,000,000" (NTUF VoteTally, 103rd Congress, 10/10/94)</p> <p>The net total of legislation Baucus voted for in the 104th Congress was: "\$41,304,000,000" (NTUF VoteTally, 104th Congress, 2/96)</p>
<p>Baucus voted to spend taxdollars on an alpine slide in Puerto Rico and a casino in Connecticut.</p>	<p>Baucus supported Clinton's 1993 "stimulus" plan. Specifically, he voted against cutting the Community Development Block Grants which would have funded the alpine slide and the casino. (CQ Vote #87: Motion agreed to 54-43: R 0-43; D 54-0, March 30, 1993)</p> <p>Baucus voted three times for cloture, which would have limited debate and allowed a vote for the Clinton plan. Baucus voted for (CQ Vote #100: Motion rejected 55-43: R 0-42; D 55-1, April 2, 1993); (CQ Vote #101: Motion rejected 52-37: R 0-37; D 52-0, April 3, 1993); and (CQ Vote #102: Motion rejected 49-29: R 0-28; D 49-1, April 5, 1993)</p> <p>Baucus once again voted against eliminating the "stimulus" aspects of the plan. (CQ Vote #103: Motion agreed to 53-45: R 0-41; D 53-4, April 20, 1993)</p>

Baucus did vote for a different "stimulus" substitute that would have lowered the amount of spending somewhat, but would have still funded the pork and still would not have paid for it, thereby still increasing the federal deficit. (CQ Vote #104: Adopted 52-46: R 0-41; D 52-5, April 20, 1993)

Baucus once more voted for cloture on the stimulus bill, but the motion failed and the projects were not funded. (CQ Vote #105: Motion rejected 56-43: R 0-42; D 56-1; April 21, 1993)

"The list below, taken from the National Conference of Mayors 'Ready to Go' book of more than 4,000 public works projects, gives a sense of exactly where much of the money would be going. While the 'Ready to Go' projects aren't specifically included in the stimulus package, HUD Secretary Henry Cisneros told Congress in February it is the list the administration will work from in dispensing the \$2.5 billion earmarked in the bill for community development."

"Caguas, Puerto Rico, build alpine slide, 100 jobs, \$2,500,000"

"West Haven, Conn., construct a casino building, 20 jobs, \$1,000,000"

(editorial, The Wall Street Journal, 4/5/93)

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE
425 SECOND STREET, NE
WASHINGTON, DC 20002-4967

3191

SIGNET BANK
ACHIEVE YOUR GOALS

18-2551464
340

APRIL 23, 19 96

PAY *****THIRTY TWO THOUSAND SIX HUNDRED THIRTY SEVEN AND 50/100 ***DOLLARS \$ 32,637.50 **

TO THE ORDER OF
MULTI MEDIA SERVICES CORP
915 KING ST. 2ND FLOOR
ALEXANDRIA, VA 22314

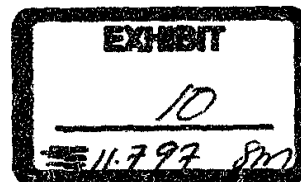
NOT NEGOTIABLE

⑈00003191⑈ ⑆056004089⑆ 651⑈7172927⑈

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

DELUXE - PCRAM W-3 V-2

DATE	DESCRIPTION	AMOUNT
4/23/96	RADIO BUYS	32,637.50



NRSC4378 004

MEMORANDUM**SENT VIA FAX**

TO: GREG STRIMPLE
FROM: DWIGHT STERLING
DATE: APRIL 22, 1996
RE: MEDIA SCHEDULE #2 COSTS - RADIO IN FOUR STATES

The following is a summary of costs for radio schedules in three states for the National Republican Senatorial Committee. The schedules will air in parts of three states: Iowa, Minnesota and Montana. The schedules will air for the second part of the four part radio schedule, from Thursday, April 25 thru Friday, May 3.

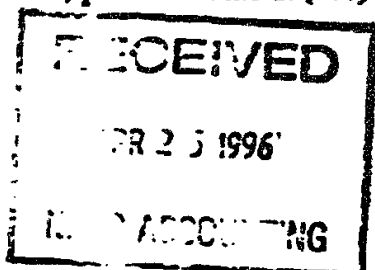
The total cost for the nine day schedules is \$32,637.50. Broken down by state, the costs are:

State	Budget	Comments
Iowa	\$ 9,863.00	Des Moines strongest, then Sioux City and Mason City.
Minnesota	\$ 13,137.50	Duluth and Minneapolis
Montana	\$ 9,637.00	Strong in Billings and Great Falls, and lighter in Missoula and Helena
TOTAL	\$ 32,637.50	

NRSC4378 005

A breakdown by radio station of the costs in each state is attached. If you have any questions, please call me at (703) 739-2160.

/ds



P.O. #

21780

Budget Code

7815 N/C

Approved:

Approved:

MEDIA**MULTI MEDIA SERVICES CORPORATION**

915 KING STREET, 2ND FLOOR • ALEXANDRIA, VIRGINIA 22314 • (703) 739-2160



NRSC NEWS '96

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Chairman, Senator Alfonse D'Amato

**FOR IMMEDIATE RELEASE:
WEDNESDAY, MAY 8, 1996
NRSC96/112**

**CONTACT: NRSC PRESS OFFICE
DAN McLAGAN
202/675-6006**

NEW GOP AD: BAUCUS VOTES FOR MORE TAXES, INCREASED DEBT, HIGHER PAY FOR HIMSELF

**NRSC RADIO CAMPAIGN URGES MONTANANS TO
CONTACT BAUCUS; AD SAYS BAUCUS SHOULD VOTE TO
BALANCE THE BUDGET NOW**

Washington, DC — The National Republican Senatorial Committee today began running a new radio spot in Montana chronicling Senator Baucus' record of raising taxes, increasing the federal debt and raising his own pay. The spot urges Montanans to contact Baucus to encourage him to balance the federal budget now.

The following sixty-second radio spot will air in Montana:

"The top movie is 'Godfather Part II.'

'Strenking,' becomes a national fad.

Max Baucus goes to Washington, and our national debt is \$484 billion.

A lot's changed in 21 years — for example, Max Baucus' salary has more than tripled, from \$42,000 to \$133,000 a year. And the national debt has skyrocketed to \$5 trillion.

What have we gotten from Baucus' 21 long liberal years? More taxes and more debt. Liberal Baucus voted for five of the largest tax increases in American history. In one vote alone, he increased taxes on Montana families by \$2,600 a year.

Baucus even voted to raise taxes on Social Security, small businesses, and gasoline.

Call liberal Max Baucus. Tell him to balance the budget. Tell him he was wrong to raise taxes and spend us into debt. Tell him to vote for the majority's plan to balance the budget.

Paid for by the National Republican Senatorial Committee."

See Attached 2 Page Documentation

EXHIBIT

11797 sm

DRAFT NRSC RADIO:60 - "1974-BAUCUS"

Music up and under

ANNCR:

1974.

The top movie is "Godfather Part II"

(SFX under Anncr. = Machine gun fire)

"Streaking." becomes a national fad.

(SFX under Anncr. = teenager yelling/running outdoors)

Max Baucus goes to Washington, and our national debt is \$484 billion.

A lot's changed in 21 years - for example, Max Baucus's salary has more than tripled, from \$42,000 to \$133,000 a year.

And the national debt has skyrocketed to \$5 trillion.

What have we gotten from Baucus's 21 long liberal years?

More taxes and more debt.

Liberal Baucus voted for five of the largest tax increases in American history. In one vote alone, he increased taxes on Montana families by \$2600 a year.

Baucus even voted to raise taxes on social security, small businesses, and gasoline.

Call liberal Max Baucus. Tell him to balance the budget. Tell him he was wrong to raise our taxes and spend us into debt. Tell him to vote for the majority's plan to balance the budget.

Paid for by the National Republican Senatorial Committee

AD TEXT

BAUCUS RECORD

<p>"1974 Max Baucus goes to Washington, and our national debt is \$484 billion."</p>	<ul style="list-style-type: none"> Baucus was elected to federal office in 1974. He has spent over 21 years in Washington. (source: The Almanac of American Politics, 1996) Total gross federal debt in 1974 was \$483.893 million (source: Statistical Abstract of the United States, 1995)
<p>"...Max Baucus' salary has more than <u>tripled</u> from \$42,000 to \$133,000 a year."</p>	<ul style="list-style-type: none"> Baucus' salary has risen from \$42,500 in January, 1975 to \$133,600 in 1996. (source: 1991 CQ Almanac; CQ Weekly Report, 1/2/93)
<p>"And the national debt has skyrocketed to \$5 trillion"</p>	<ul style="list-style-type: none"> The national debt as of Wednesday, April 17, 1996, was \$5,146,356,518,536.99. (The Washington Times, 4/19/96)
<p>"Liberal Baucus voted for <u>five</u> of the largest tax increases in American history."</p>	<ul style="list-style-type: none"> Clinton Tax Increase of 1993, Conference Report (CQ Vote #247, 1993) (\$241 billion over five years*) Budget Reconciliation Tax Increases of 1982, Conference Report (CQ Vote #337, 1982) (\$138 billion over four years*) Budget Reconciliation of 1987, Conference Report (CQ Vote #419, 1987) (\$54 billion over four years*) Deficit Reduction Act of 1984, Conference Report (CQ Vote #161, 1984) (\$48.3 billion over 4 years*) Social Security Act Amendments of 1983, Conference Report (CQ Vote #54, 1983) (\$36.7 billion over four years*) (Tax Foundation Press Release, 9/2/93)
<p>"In one vote <u>alone</u>, he increased taxes on Montana families by \$2,600 a year."</p>	<ul style="list-style-type: none"> Baucus voted for adoption of the conference report. (CQ Vote #247: Adopted 51-50: R 0-44; D 50-6, with Vice President Al Gore casting a "yea" vote, Aug. 6, 1993.) The Heritage Foundation, in an April 7, 1994, study entitled "The State and District Impact of The Clinton Tax Increase," calculated that the 1993 Clinton/Baucus tax bill will cost Montana's taxpayers \$541,779,082 over five years, or \$668.04 for every man, woman and child in Montana. (family of four) \$668.04 per family of four

<p>"Baucus <u>even</u> voted to raise taxes on social security....</p> <p>"...small businesses...."</p>	<ul style="list-style-type: none"> • Baucus voted to table (kill) the amendment to strike the provisions of the bill that raise the percentage of Social Security benefits taxed from 50 percent to 85 percent for individuals earning more than \$32,000 and couples earning more than \$40,000. (CQ Vote #169: Motion agreed to 51-46: R 1-41; D 50 A. June 24, 1993) • Baucus voted for adoption of the conference report on Clinton's 1993 tax bill which included a tax increase on annual earnings. (CQ Vote #247: Adopted 51-50: R 0-44, D 50-6, with Vice President Al Gore casting a "yea" vote, Aug. 6, 1993.) • Baucus voted against an amendment giving tax relief to small businesses and family farms. (CQ Vote #171: Motion rejected 56-42: R 43-0, D 13-42. June 24, 1993)
<p>"...and gasoline."</p>	<ul style="list-style-type: none"> • Baucus voted against eliminating a gasoline tax of three cents per gallon to raise revenues. (CQ Vote #208: Adopted 209-187: R 114-17, D 95-170. June 11, 1975). • Baucus voted to kill an amendment eliminating the 4.3-cent tax on transportation fuels. (CQ Vote #167: Motion agreed 50-48: R 0-43, D 50-5. July 24, 1993) • Baucus voted for adoption of the conference report on Clinton's 1993 tax bill which included an increase of 4.3 cents in the federal gasoline tax. (CQ Vote #247: Adopted 51-50: R 0-44; D 50-6, with Vice President Al Gore casting a "yea" vote, Aug. 6, 1993.)

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE
425 SECOND STREET, NE
WASHINGTON, DC 20002-4087

3216

SIGNET BANK
FOR DEPOSIT ONLY

⑆32164

PAY TO THE ORDER OF MAY 8 1996

PAY ONE HUNDRED SIXTY THOUSAND AND XI/100 ***** DOLLARS \$160,000.00**

TO THE ORDER OF
MULTI MEDIA
801 NORTH FAIRFAX STREET
ALEXANDRIA VA 22314

NON-NEGOTIABLE

⑈00003216⑈ ⑆056004089⑆ 651-7172927⑈

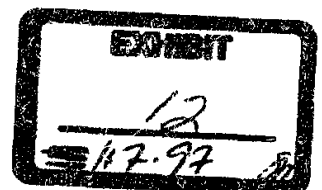
NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

DELUXE - FORM W-3 V-2

DATE	DESCRIPTION	AMOUNT
5/8/96	---MN & MONTANA_ POLITICAL	160,000.00

5085

NRSC4378 006



NATIONAL REPUBLICAN SENATORIAL COMMITTEE

CHECK AUTHORIZATION FORM

Vendor Name & Address:

Multi Media
801 North Fairfax Street
Alexandria, VA 22314

Division:

Political

Contact Person:

Date:

5/8/96

Due Date:

5/8/96

Telephone No.:

P.O. Number:

Amount:

\$160,000-

Account No.:

01-7805

Purpose:

Multi Media

The amount should be expensed to the

01-7805-000

line(s) on my budget

☐ THIS AMOUNT IS IN BUDGET

line(s) on my budget

AUTHORIZED FOR PAYMENT

[Signature]
 DIRECTOR

[Signature]
 CONTROLLER

[Signature]
 STAFF SECRETARY

[Signature]
 EXECUTIVE DIRECTOR

FOR ACCOUNTING PURPOSES ONLY

☐ P.O. (FULL PAYMENT)

☐ P.O. (PARTIAL PAYMENT)

VENDOR #

☐ ENTERED MANUAL CHECK

Invoice #	Inv. Date	Inv. Total	GL Code	FEC Code	Amount	PO #
			01-7805		160,000-	
TOTAL						

☐ MAIL TO VENDOR

NRSC4378 007



NRSC NEWS '96

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Chairman, Senator Alfonse D'Amato

**FOR IMMEDIATE RELEASE:
SUNDAY, MAY 12, 1996
NRSC96/122**

**CONTACT: NRSC PRESS OFFICE
DAN MCLAGAN
202/675-6006**

NEW NRSC TV AD TO BAUCUS: SUPPORT A BALANCED BUDGET

**STATEWIDE MONTANA TV AD CAMPAIGN
BEGINS AIRING THIS WEEKEND**

Washington, DC -- The following is the text of a new 30 second statewide TV spot from the National Republican Senatorial Committee urging Montana Senator Max Baucus to support a balanced federal budget

**TV/30 Seconds
Title: "1974-Baucus"**

*1974: Liberal Max Baucus goes to Washington.
Your share of the national debt: \$2,300.*

*22 long liberal years later. Government spending explodes.
Baucus votes for five of the biggest tax increases in history.*

*Your share of the national debt: \$19,000.
What else is up?*

Baucus's salary -- it's tripled to \$133,000.

We need a balanced budget.

*Call liberal Max Baucus, and tell him to support the
Majority's balanced budget plan.*



NRSC TV:30 - "1974-BAUCUS"
FINAL AUDIO

VIDEO

GRAPHICS: 1974
 Baucus still (any of '74 vintage?)
 (possibly in sepia)

GRAPHICS: Your share of national debt --
\$2300

GRAPHICS: 1996
 Headline on Spending

GRAPHICS: Baucus votes for five of the
biggest tax increases in American history

GRAPHICS: Your share of national debt --
\$19,000

MOVING UPWARD ARROW AGAINST
GRAPH LABELED BAUCUS SALARY
 Arrow ends at \$133,000

Baucus pix
GRAPHICS: Call Max Baucus/Phone
#??/Balance the Budget

Disclaimer

AUDIO

ANNCR:

1974.

Liberal Max Baucus goes to Washington.

Your share of the national debt-- \$2300.

22 long liberal years later. Government
spending explodes.

Baucus votes for five of the biggest tax
increases in history.

Your share of the national debt --
\$19,000.

What else is up?

Baucus's salary. It's tripled to \$133,000.

We need a balanced budget.

Call liberal Max Baucus and tell him to
support the majority's balanced budget plan.

NRSC TV:10 - "HEY MAX"
FINAL AUDIO

VIDEO

Baucus Pix
GRAPHICS: Max Baucus/Stop Increasing
Our Taxes and Your Pay

Disclaimer

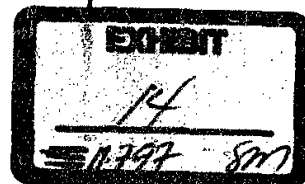
AUDIO

ANNCR:

Hey Max!

Stop raising our taxes and your pay.

Call Max Baucus and tell him to support the
majority's balanced budget plan!





NRSC NEWS '96

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Chairman, Senator Alfonse D'Amato

FOR IMMEDIATE RELEASE:
TUESDAY, MAY 28, 1996
NRSC96/140

CONTACT: NRSC PRESS OFFICE
DAN McLAGAN
202/675-6006

NEW GOP AD URGES BAUCUS TO BALANCE THE BUDGET

Washington, DC — The following is the text of a new 30 second TV spot which began airing statewide in Montana on Friday from the National Republican Senatorial Committee urging liberal Senator Max Baucus to support a balanced budget.

TV/30 Seconds
Title: "Twenty-two"

By one vote, the Senate passed the largest tax increase in history. That one vote...Max Baucus.

He voted for more taxes on Social Security, gasoline and family farms.

It's no surprise.

For twenty-two long liberal years, Baucus has spent our money and raised our taxes. He's the sixth biggest spender in the Senate.

Max Baucus...definitely a liberal.

Call. Tell Baucus to vote for the majority's plan to balance the budget.

EXHIBIT

15

5/17/97 SM



NRSC NEWS '96

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Chairman, Senator Alfonse D'Amato

FOR IMMEDIATE RELEASE
FRIDAY, MAY 31, 1996
NRSC96/149

CONTACT: NRSC PRESS OFFICE
DAN McLAGAN
202/675-6006

NEW GOP AD URGES BAUCUS TO SUPPORT BALANCED BUDGET PLAN

Washington, D.C. -- The following is a text of a new 30 second TV spot which begins airing today in Montana. The ads are paid for by the National Republican Senatorial Committee and are aimed at urging Montana Senator Max Baucus to support the majority's balanced budget plan.

VIDEO

Hand presses button to start tape recorder
Fuse lit and burns supered over video

Hands pick up Baucus photo from manilla file
folder marked TOP SECRET in block stencil
lettering

Hand flips to next piece of paper with
GRAPHICS (block stencil lettering): Max
Baucus/Voted for 5 of the Biggest Tax Increases
in American History

Hand flips to piece of paper with GRAPHICS
(block stencil lettering): Max Baucus/Voted to
Raise Taxes on: Social Security/Family Farms
(smaller date = 8/6/93)

Tape recorder playing

Hand presses off button on tape recorder
(300) 332-4106

Disclaimer

AUDIO

(Music Up & Under)

ANNCR:

Good Morning, Mr. Phelps.

This is Max Baucus, liberal from Montana.

Baucus diagnoses his record.

Baucus voted for five of the biggest tax increases
in history.

Baucus voted to raise taxes on Social Security and
family farms.

Your mission, which may be impossible, is to get
Baucus to support the majority's balanced
budget plan.

Good Luck, Jim.

ANNCR:

Help Jim. Call liberal Max Baucus. This
message will self-destruct in one second.

(SFX = Hissing as tape dissolves)

(Music: Under & Out)

EXHIBIT

16
5/17/97

3253

92-581464
MAR 96

SIGNET BANK
A/C # 111 1111111111

**NATIONAL REPUBLICAN
SENATORIAL COMMITTEE**
425 SECOND STREET, NE
WASHINGTON, DC 20002-4867

MAY 20 19 96

PAY SIXTY FIVE THOUSAND AND 00/100***** DOLLARS \$ 65,000.00**

TO THE ORDER OF
SHELIAH REP ASSOCIATES
3505 CAMERON STATION ROAD
ALEXANDRIA, VA 22305

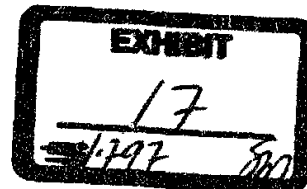
NOT NEGOTIABLE

⑈00003253⑈ ⑈056004089⑈ 651⑈717292⑈

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

DELUXE - FORM W-3 V-3

DATE	DESCRIPTION	AMOUNT
05/20/96	MEDIA PLACEMENT - 7805	65,000/00



NRSC4378 008

INVOICE**SENT VIA FAX**

To: National Republican Senatorial Committee
From: Shellah Roy Associates
Re: Montana Television - Costs
Date: May 17, 1996

The National Republican Senatorial Committee will air television schedules in Montana over two weeks, from Friday, May 24 thru Thursday, June 6. The schedules will air in five television markets: Missoula, Billings, Great Falls, Butte-Bozeman and Helena.

The total cost for the two week schedules is ~~\$65,000.00~~. Broken down by market, the costs are:

<u>Market</u>	<u>Week</u>	<u>Cost</u>	<u>GRPs</u>
Missoula	5/24-5/30	\$ 12,500	900 (700-:30's/200-:10's)
	5/31-6/06	\$ 6,500	500 (300-:30's/200-:10's)
Billings	5/24-5/30	\$ 12,000	900 (700-:30's/200-:10's)
	5/31-6/06	\$ 6,000	500 (300-:30's/200-:10's)
Great Falls	5/24-5/30	\$ 8,000	900 (700-:30's/200-:10's)
	5/31-6/06	\$ 5,000	500 (300-:30's/200-:10's)
Butte-Bozeman	5/24-5/30	\$ 8,250	900 (700-:30's/200-:10's)
	5/31-6/06	\$ 4,750	500 (300-:30's/200-:10's)
Helena	5/24-5/30	\$ 1,000	170 (90-:30's/80-:10's)
	5/31-6/06	\$ 1,000	170 (90-:30's/80-:10's)
TOTAL		\$ 65,000.00	

Please call us at (703) 360-5671 with any questions.

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

CHECK AUTHORIZATION FORM

Vendor Name & Address:

MULTI MEDIA SERVICES

Division:

POLITICAL

915 KING ST

Contact Person:

2nd Floor

Date:

JUNE 13 / 96

Alexandria VA 22314

Due Date:

Telephone No.:

P.O. Number:

N/A

Amount:

30,000⁰⁰

Account No.:

Production for

Purpose:

ADVERTISING TO air in two states: Minnesota & Montana

The amount should be expensed to the

7805

line(s) on my budget

☐ THIS AMOUNT IS IN BUDGET

line(s) on my budget

AUTHORIZED FOR PAYMENT

[Signature]
DIVISION DIRECTOR

[Signature]
COMPTROLLER

[Signature]
STAFF SECRETARY

[Signature]
EXECUTIVE DIRECTOR

FOR ACCOUNTING PURPOSES ONLY

☐ P.O. (FULL PAYMENT)

☐ P.O. (PARTIAL PAYMENT)

VENDOR #:

☐ ENTERED MANUAL CHECK

Invoice #	Inv. Date	Inv. Total	G/L Code	FEC Code	Amount	PO #
TOTAL						

☐ MAIL TO VENDOR

NRSC4378 011

INVOICE MEMORANDUM

SENT VIA FAX

TO: NATIONAL REPUBLICAN SENATORIAL COMMITTEE
FROM: MULTI MEDIA SERVICES CORPORATION
DATE: JUNE 3, 1996
RE: MEDIA COSTS - PRODUCTION

The following production costs were incurred for advertising to air in two states:
Minnesota and Montana.

PRODUCTION COSTS: \$ 30,000.00

If you have any questions, please call us at (703) 739-2160.

/ds



NRSC4378 012

MULTI MEDIA SERVICES CORPORATION

915 KING STREET, 2ND FLOOR • ALEXANDRIA, VIRGINIA 22314 • (703) 739-2160

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

CHECK AUTHORIZATION FORM

Vendor Name & Address:

MULTI MEDIA SERVICES.

Division: POLITICAL

915 KING ST.

Contact Person: _____

2nd. Floor

Date: June 3/96

Alexandria VA 22314

Due Date: _____

Telephone No.: _____

P.O. Number: N/A

Amount: 65,000⁰⁰

Account No.: _____

Purpose: AIR TELEVISION IN MONTANA OVER TWO WEEKS.

6/7 - 6/20/96

The amount should be expensed to the 7805

line(s) on my budget

☐ THIS AMOUNT IS IN BUDGET

line(s) on my budget

AUTHORIZED FOR PAYMENT

[Signature]
DIVISION DIRECTOR

[Signature]
COMPTROLLER

STAFF SECRETARY

EXECUTIVE DIRECTOR

FOR ACCOUNTING PURPOSES ONLY

☐ P.O. (FULL PAYMENT)

☐ P.O. (PARTIAL PAYMENT)

VENDOR #: _____

☐ ENTERED MANUAL CHECK

Invoice #	Inv. Date	Inv. Total	G/L Code	FEC Code	Amount	PO #
TOTAL						

☐ MAIL TO VENDOR

INVOICE

SENT VIA FAX

To: National Republican Senatorial Committee
From: Multi Media Services Corporation
Re: Montana Television - Costs
Date: June 3, 1996

The National Republican Senatorial Committee will air television schedules in Montana over two weeks, from Friday, June 7 thru Thursday, June 20. The schedules will air in five television markets: Missoula, Billings, Great Falls, Butte-Bozeman and Helena.

The total cost for the two week schedules is \$65,000.00. Broken down by market, the costs are:

Market	Week	Cost	GRPs
Missoula	6/07-6/13	\$ 12,500	900 (700-:30's/200-:10's)
	6/14-6/20	\$ 6,500	500 (300-:30's/200-:10's)
Billings	6/07-6/13	\$ 12,000	900 (700-:30's/200-:10's)
	6/14-6/20	\$ 6,000	500 (300-:30's/200-:10's)
Great Falls	6/07-6/13	\$ 8,000	900 (700-:30's/200-:10's)
	6/14-6/20	\$ 5,000	500 (300-:30's/200-:10's)
Butte-Bozeman	6/07-6/13	\$ 8,250	900 (700-:30's/200-:10's)
	6/14-6/20	\$ 4,750	500 (300-:30's/200-:10's)
Helena	6/07-6/13	\$ 1,000	170 (90-:30's/80-:10's)
	6/14-6/20	\$ 1,000	170 (90-:30's/80-:10's)
TOTAL		\$ 65,000.00	

Please call us at (703) 739-2160 with any questions.

/ds



NRSC4378 014

MULTI MEDIA SERVICES CORPORATION

915 KING STREET, 2ND FLOOR • ALEXANDRIA, VIRGINIA 22314 • (703) 739-2160



NRSC NEWS '96

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Chairman, Senator Alfonse D'Amato

**FOR IMMEDIATE RELEASE
FRIDAY, JUNE 21, 1996
NRSC96/179**

**CONTACT: NRSC PRESS OFFICE
DAN McLAGAN
202/675-6006**

EMJ
LYL
AJ
DE

NRSC LAUNCHES NEW MONTANA TV ADS

SPOTS URGE BAUCUS TO SUPPORT BALANCED BUDGET

WASHINGTON, D.C. – The following is the script of a new NRSC television ad that begins airing in Montana today.

AUDIO

**In his 22 long liberal years,
Max Baucus has voted over 50
times to raise taxes.**

**Baucus even voted to raise taxes
on Social Security, Medicare
recipients, small businesses and
the family farm.**

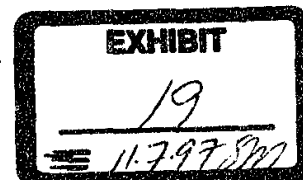
**Max, you can't hide from your
record -- you're definitely a liberal.**

**Call, tell liberal Max Baucus to
support the majority's plan to
balance the budget and cut our taxes.**

###

VIDEO

**Scrolling list of Baucus votes for
more taxes**



AD TEXT

(ANNCR #1)

BAUCUS RECORD

<p>"In his 22 long liberal years, ..."</p>	<ul style="list-style-type: none"> Baucus has been in federal office since 1975. He has spent 22 years in Washington. (The Almanac of American Politics, 1996)
<p>"Max Baucus has voted over 50 times to raise taxes."</p>	<ul style="list-style-type: none"> Max Baucus has voted to raise taxes over 50 times. (CQ Vote #339, 1993;) CQ Vote #335, 1993; CQ Vote #327, 1993; CQ Vote #247, 1993; CQ Vote #244, 1993; CQ Vote #190, 1993; CQ Vote #186, 1993; CQ Vote #169, 1993; CQ Vote #167, 1993; CQ Vote # 83, 1993; CQ Vote # 82, 1993; CQ Vote # 79, 1993; CQ Vote # 70, 1993; CQ Vote # 68, 1993; CQ Vote # 66, 1993; CQ Vote # 60, 1993; CQ Vote # 59, 1993; CQ Vote # 57, 1993; CQ Vote # 53, 1993; CQ Vote # 52, 1993; CQ Vote # 48, 1993; CQ Vote # 40, 1993; CQ Vote #145, 1992; CQ Vote # 54, 1992; CQ Vote # 51, 1992; CQ Vote # 50, 1992; CQ Vote # 48, 1992; CQ Vote #285, 1990; CQ Vote #280, 1990; CQ Vote #277, 1990; CQ Vote #243, 1989; CQ Vote #236, 1989; CQ Vote #170, 1988; CQ Vote #419, 1987; CQ Vote #157, 1987; CQ Vote # 97, 1987; CQ Vote # 87, 1987; CQ Vote # 86, 1986; CQ Vote # 83, 1986; CQ Vote # 79, 1986; CQ Vote # 77, 1986; CQ Vote #379, 1985; CQ Vote #314, 1985; CQ Vote #212, 1985; CQ Vote # 75, 1985; CQ Vote # 52, 1985; CQ Vote #161, 1984; CQ Vote #101, 1984; CQ Vote # 88, 1984; CQ Vote # 77, 1984; CQ Vote # 58, 1984; CQ Vote # 54, 1983; CQ Vote # 53, 1983; CQ Vote # 41, 1983; CQ Vote #463, 1982; CQ Vote #410, 1982; CQ Vote #337, 1982; CQ Vote #241, 1982; CQ Vote #239, 1982; CQ Vote #238, 1982; CQ Vote #286, 1981; CQ Vote #103, 1981; CQ Vote # 64, 1980; CQ Vote #484, 1979; CQ Vote #459, 1979; CQ Vote #438, 1979; CQ Vote #292, 1979; CQ Vote #805, 1978; CQ Vote #491, 1976; CQ Vote #168, 1976; CQ Vote #548, 1975; CQ Vote #547, 1975; CQ Vote #208, 1975; CQ Vote # 21, 1975; CQ Vote # 18, 1975)

<p>"Baucus even voted to raise taxes on Social Security, ..."</p>	<ul style="list-style-type: none">• Baucus voted to table (kill) the amendment to strike the provisions of the bill that raise the percentage of Social Security benefits taxed from 50 percent to 85 percent for individuals earning more than \$32,000 and couples earning more than \$40,000. (CQ Vote #169: Motion agreed to 51-46, June 24, 1993)• Baucus voted for adoption of the conference report on Clinton's 1993 tax bill which included a tax increase on social security. (CQ Vote #247: Adopted 51-50, Aug. 6, 1993.)
<p>"... Medicare recipients, ..."</p>	<ul style="list-style-type: none">• Baucus voted for the adoption of the conference report on the bill to cap the amounts for which Medicare beneficiaries will be financially liable for Medicare-covered services and to make other changes in the program. Included in the bill were increased monthly flat-premium benefits and an income tax surcharge on Part A eligible elderly. (CQ Vote #170: Adopted 86-11: R 34-11; D 52-0: June 8, 1988)
<p>"... small businesses, ..."</p>	<ul style="list-style-type: none">• Baucus voted against an amendment giving tax relief to small businesses and family farms. (CQ Vote #171: Motion rejected 56-42: R 43-0, D 13-42, June 24, 1993)• Baucus voted for adoption of the conference report on Clinton's 1993 tax bill which included a tax increase on farms, small businesses, and individuals. (CQ Vote #247: Adopted 51-50, Aug. 6, 1993.)
<p>"... and the family farm."</p>	<ul style="list-style-type: none">• Baucus voted against an amendment giving tax relief to small businesses and family farms. (CQ Vote #171: Motion rejected 56-42: R 43-0, D 13-42, June 24, 1993).• Baucus voted for adoption of the conference report on Clinton's 1993 tax bill which included a tax increase on farms, small businesses, and individuals. (CQ Vote #247: Adopted 51-50, Aug. 6, 1993.)

3318

**NATIONAL REPUBLICAN
SENATORIAL COMMITTEE**

 425 SECOND STREET, NE.
WASHINGTON, DC 20002-4967

SIGNET BANK
ACH PAY DEPOSIT
SERIAL 100

 98-1081464
560

JUNE 18 19 96

 PAY **ONE HUNDRED FORTY NINE THOUSAND FIVE HUNDRED AND 00/100***** DOLLARS \$ **149,500.00**

 TO
THE
ORDER
OF

 MULTI MEDIA SERVICES CORP.
915 KING ST., 2ND FLOOR
ALEXANDRIA, VA 22314

NOT NEGOTIABLE

⑈00003318⑈ ⑆056004089⑆ 651⑈7172927⑈

 NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

DELUXE - FORM WV-3 V-2

DATE	DESCRIPTION	AMOUNT
06/18/96	MEDIA BUYS - 7815	149,500.00

NRSC4378 015



INVOICE**SENT VIA FAX**

To: National Republican Senatorial Committee
From: Multi Media Services Corporation
Re: Montana Television - Costs
Date: June 18, 1996

The National Republican Senatorial Committee will air television schedules in Montana over two weeks, from Friday, June 21 thru Wednesday, July 3. The schedules will air in five television markets: Missoula, Billings, Great Falls, Butte-Bozeman and Helena.

The total cost for the two week schedules is \$65,000.00. Broken down by market, the costs are:

Market	Week	Cost	GRPs
Missoula	6/21-6/27	\$ 12,500	900 (700-:30's/200-:10's)
	6/28-7/03	\$ 6,500	500 (300-:30's/200-:10's)
Billings	6/21-6/27	\$ 12,000	900 (700-:30's/200-:10's)
	6/28-7/03	\$ 6,000	500 (300-:30's/200-:10's)
Great Falls	6/21-6/27	\$ 8,000	900 (700-:30's/200-:10's)
	6/28-7/03	\$ 5,000	500 (300-:30's/200-:10's)
Butte-Bozeman	6/21-6/27	\$ 8,250	900 (700-:30's/200-:10's)
	6/28-7/03	\$ 4,750	500 (300-:30's/200-:10's)
Helena	6/21-6/27	\$ 1,000	170 (90-:30's/80-:10's)
	6/28-7/03	\$ 1,000	170 (90-:30's/80-:10's)
TOTAL		\$ 65,000.00	

Please call us at (703) 739-2160 with any questions.

/ds JUN 17 1996

NRSC ACCOUNTING



NRSC4378 016

MULTI MEDIA SERVICES CORPORATION

915 KING STREET, 2ND FLOOR • ALEXANDRIA, VIRGINIA 22314 • (703) 739-2160

Dennis Rehberg appearance on the Pat Stinson show, 5/1 at 8:30 am.

Stinson I tried to get a hold of you yesterday. You were gone. You were flying somewhere?

Rehberg Yeah, I flew back to Washington, D.C.

Stinson Gettin money, huh?

Rehberg That's right....

Stinson Are you in DC now?

Rehberg I am. In fact, what I'm doing is I am meeting with the [National Republican] Senatorial Committee.

